

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PATRICE GORDON,

Plaintiff,

v.

BOARD OF EDUCATION FOR THE CITY OF CHICAGO; JANICE JACKSON, in her official capacity as Chief Executive Officer for the Chicago Public Schools, and in her individual capacity; BOGDANA CHKOUMBOVA, in her official capacity as Chief Schools Officer for the Chicago Public Schools, and in her individual capacity; LAURA LEMONE, in her official capacity as Network Chief, District 14 for the Chicago Public Schools, and in her individual capacity; JADINE CHOU, in her official capacity as Chief of Safety and Security for the Chicago Public Schools, and in her individual capacity; MICHAEL PASSMAN, in his official capacity as Chief Communications Officer for the Chicago Public Schools, and in his individual capacity; DEBRA SPRAGGINS, in her official capacity as Director of Investigations at the Office of Student Protections for the Chicago Public Schools, and in her individual capacity; and JANE AND JOHN DOE, employees of the Chicago Public Schools, in their official and individual capacities.

Defendants.

Case No. _____

JURY DEMANDED

COMPLAINT

Plaintiff, PATRICE GORDON, by and through his attorneys, GINSBERG JACOBS, LLC, for his Complaint against Defendants, BOARD OF EDUCATION FOR THE CITY OF CHICAGO ("CPS"), BOGDANA CHKOUMBOVA, LAURA LEMONE, JADINE CHOU, MICHAEL PASSMAN, DEBRA SPRAGGINS, and JANE and JOHN DOE, states as follows:

“To speak evil of anyone, unless there is unequivocal proofs of their deserving it, is an injury for which there is no adequate reparation.” George Washington

INTRODUCTION

1. Pat Gordon brings this action because in defaming him and violating his constitutional rights, CPS did not fire him from *one* job – as safety officer and basketball coach at Lincoln Park High School – it fired him from *every* job in America, which the law prohibits.

BACKGROUND

2. Pat Gordon not only worked and coached at Lincoln Park High School (“LPHS” or “school”) for almost a decade without incident, he was universally respected and beloved by students, players, parents, and peers.

3. That all changed suddenly on January 8, 2020.

4. Without notice or explanation, CPS abruptly suspended him. CPS claimed Coach Gordon had taken the boys’ basketball team on an “unauthorized” trip to Detroit for a holiday tournament the week before. The allegation and statement are false.

5. A parent of one player also claimed Coach Gordon “retaliated” against his son – by reducing his playing time – because he reported on events that allegedly took place during the trip. The allegation and statement are false. Coach Gordon did not “retaliate” against any player.

6. There were also allegations that students on the trip – ***not*** any adults – may have had sexual relations in a hotel room the last night of the trip, and that Coach Gordon somehow knew it or learned of such activity in the days ***afterward*** and failed to report it.

7. The allegation and statement are false. No such conduct was ever reported to Coach Gordon, and Coach Gordon had no knowledge whatsoever of any such conduct taking place, or having claimed to have taken place.

8. To this day Coach Gordon has not been provided evidence of any sexual acts taking place on the trip, but again, if any occurred, he was and remains fully *unaware*.

9. Chaos then erupted at the high school.

10. Over the next three weeks – from Coach Gordon’s suspension on January 8, 2020 through January 31, 2020 – CPS fired or suspended five other school leaders.

11. On January 24, 2020, CPS suspended – without notice or warning – the girls’ varsity basketball coach, **Larry Washington**, who had coached the girls’ team and taught at the school for 23 years, all without incident.

12. A week later, late on Friday afternoon, January 31, 2020, CPS terminated or suspended four other school leaders:

- **John Thuet**: Principal – terminated – without notice or explanation.
- **Michelle Brumfield**: Assistant Principal – terminated – without notice or explanation.
- **John Johnson**: Dean – suspended – without notice or explanation.
- **Donovan Robinson**: Interim Boys’ Varsity Basketball Coach and Dean at Michele Clark High School – suspended – without notice or explanation.

(Gordon, Washington, Thuet, Brumfield, Johnson, and Robinson, together the “**Lincoln Park Six**”)

13. Together the Lincoln Park Six had over 80 years of service in CPS without a single confirmed disciplinary incident, yet now all were terminated and suspended.

14. Not surprisingly, CPS’ abrupt suspensions and terminations of the Lincoln Park Six triggered immediate attention, media reports, and outcry by the community. CPS’ actions garnered national attention with Pat Gordon specifically identified in dozens – perhaps hundreds – of print and broadcast reports.

CPS Repeatedly Defames Gordon at Public Meeting and in Media

15. Three days later, on Monday, February 3, 2020, CPS held a public meeting at the school to try to quell the tremendous unrest and outrage over CPS' actions (the "Meeting").

16. Defendants LeMone and Chou led the Meeting. Defendants Chkoumbova and Spraggins attended, participated in, and spoke at the Meeting. On information and belief, Defendant Passman attended the Meeting and conferred with the other individual defendants on how to run the Meeting and what to say at the Meeting.

17. At the Meeting, which lasted almost three hours, the Defendants used a power-point presentation that repeatedly made charges of "adult on student sexual misconduct," which they explained to mean that at least some of the Lincoln Park Six adults committed, or were alleged to have committed, direct sexual misconduct against a student. **Exhibit 1.**

18. But at the Meeting, Defendants did not identify which of the Lincoln Park Six adults was accused of committing "adult on student sexual misconduct," thereby leaving the false impression that any or all of the adults might have committed "adult on student sexual misconduct."

19. Besides the "alleged adult on student sexual misconduct," Defendants – aided by their power-point – made statements that other "serious (non-sexual) misconduct" had actually *occurred*, not just been alleged. *Id.*

20. It was why, as Defendant Chkoumbova, told the standing room only crowd, CPS' actions were "irreversible." She said, as was widely reported in broadcast and print media: "If there is no evidence or the investigations are not concluding that this is the next right move, CPS would not have done this." *Chicago Sun Times*, "Multiple Allegations of Sex Misconduct, other Wrongdoing Led to Removals at Lincoln Park, CPS Says" (February 3, 2020, 9:11 pm).

Exhibit 2.

21. Similarly, Defendant Spraggins said at the Meeting: “There are allegations of both adult-on-student sexual misconduct as well as student on student.” *Id.*

22. After the meeting, Defendants made or leaked similar (false) statements to the media and Alderman Michele Smith, whose ward includes the school. Defendant Passman made multiple statements to multiple media outlets about the school and the Lincoln Park Six.

23. With that, Pat Gordon had been among those accused of committing sexual misconduct against a student and/or other serious (non-sexual) misconduct that put students in jeopardy.

24. The statements, impressions, and inferences were false.

25. Pat Gordon committed no “adult on student sexual misconduct.”

26. Pat Gordon also committed no “serious (non-sexual) misconduct.”

27. In fact, Coach Gordon had never been accused of committing “adult on student sexual misconduct,” but that was the *misimpression* the audience – and the media reporting – was left with based on Defendants’ statements grouping all six members of the Lincoln Park Six together.

28. Coach Gordon had also not committed any “serious (non-sexual) misconduct, but that was the *misimpression* the audience – and the media reporting – were left with based on Defendants’ statements.

The Sham “Hearing” CPS Held

29. After defaming him, CPS then provided Gordon no information or evidence for six months while he waited in the dark, suspended without pay.

30. Then, to formalize Coach Gordon’s termination, CPS held a rushed “hearing.”

31. On Monday, June 22, 2020, at 4:14 pm, after waiting more than six months, CPS (finally) told Gordon what he was “charged” with.

32. CPS sent Gordon an email that included the charges and (finally) provided parts of its investigative file, which was so large, CPS sent it to Gordon in 12 separate files, spanning more than 500 pages of highly redacted, disorganized, and in some places, illegible documents.¹

33. The curt email notice CPS sent Gordon also instructed that his termination hearing was set for the next Monday, June 29, 2020, at 9:00 am., meaning in less than a week. *Id.*

34. It also said that if he had any evidence to submit, he must do so by the end of that week. *Id.*

35. So after six months waiting for *any* information about his case, CPS dumped 12 files of documents on him and set a hearing for less than a week later.

36. After Gordon pled for time to review the file and prepare his response, CPS continued the hearing for one week past the July 4 holiday.

37. At the hearing, CPS presented no witnesses, only redacted “statements” its investigators had gathered in the months prior, none of whom Gordon was allowed to ever question, let alone cross examine.

38. At the hearing, the CPS “prosecutor” presented little to no actual evidence, instead only providing a “summary” of the investigation.

39. Gordon was not allowed to present live witnesses, only whatever affidavits he could gather in short order over an intervening July 4 holiday period.

40. The hearing even violated the very “procedures” CPS provided Gordon when it levied the charges, which procedures state that the “employee shall have the right to present oral and/or written evidence, including the direct examination and cross-examination of witnesses.”

¹ Coach Gordon welcomes filing the entire CPS’ investigative file and seeks to do so, but as a courtesy will give Defendants an opportunity to move to have it filed under seal or as-redacted.

41. Even so, Gordon did scramble best he could and presented witness statements along with a hearing statement that he read into the record. His witness statement was 22 pages, and it did what the CPS prosecutor failed to do when she quickly presented her case in summary fashion: it actually examined the underlying “evidence” scattered in CPS’ own files and refuted each charge point-by-point.

42. It would not matter.

43. The “hearing officer” was a CPS employee from its legal department, meaning the “prosecutor” and the “judge” (so to speak) had the same boss: CPS.

44. The hearing officer issued no findings and presented no written report or recommendation.

45. Then again, how could she when her boss rendered her decision less than a week later?

46. On July 20, 2020, Mary Ernesti – a more senior CPS lawyer – wrote to Gordon: “Based on the **results** of the discharge hearing held on July 10, 2020, I have **determined** that sufficient basis exists to terminate your services as a School Security Officer in the Chicago Public Schools. . . . If the Board of Education of the City of Chicago adopts my recommendation, your employment will be terminated and a Do Not Hire designation will be placed in your record.”

Exhibit 3 (emphasis added).

47. To be clear, Ernesti had not attended Gordon’s (Zoom) hearing.

48. Ernesti’s short letter did not share what the “results” of the hearing were that she referenced or on what basis Ernesti made her “determin[ation] that sufficient cause exists to terminate your services.” *Id.*

49. Gordon was never provided anything.

50. Instead – voila – two days later, the Board rubber-stamped Ernesti’s recommendation at its regularly scheduled monthly meeting without review, comment, or discussion.

51. Defendant Jackson – the CEO of CPS – conveyed the formality that Gordon was terminated in a letter dated July 24, 2020. **Exhibit** 4.

52. So in less than two weeks, one CPS lawyer presented and prosecuted the case to another CPS lawyer, who after “hearing” it and ostensibly reviewing a cumbersome record, then shared her “results” with a third CPS lawyer (but not with Gordon), who in turn got the Board to rubber stamp her dismissal recommendation two days later – all without Gordon provided anything substantive.

53. And keep in mind – normally – CPS takes between six weeks and three months to render a final decision after a hearing – and often takes more than a year – yet in this instance, it took just over a week, perhaps a first in CPS history.

54. “Due process” was not just lacking, it was laughable.

55. And as a result, CPS did not just terminate Gordon from his job as a security officer and coach at Lincoln Park High School, it effectively terminated him from all employment, but especially the employment to which he had devoted his life: coaching.

56. Accordingly, Gordon now brings this action to restore the good name and reputation he earned over decades of hard work and good deeds – which Defendants willfully and wantonly destroyed – and to obtain damages. An apology would also be nice.

PARTIES

57. Plaintiff Pat Gordon (“Gordon”) is a resident of Chicago, Illinois.

58. Defendant Board of Education for the City of Chicago (“CPS”) is a public agency that administers the Chicago Public Schools. CPS maintains offices at 42 W. Madison Street, Chicago, Illinois. CPS employed Gordon.

59. Defendant Janice Jackson (“Jackson”) is the Chief Executive Officer (“CEO”) of CPS. Defendant Jackson is being sued in her official capacity as a person who, acting under color of state law, deprived Plaintiff of his constitutional rights, and in her individual capacity as a tortfeasor. Defendant Jackson maintains an office at 42 W. Madison Street, Chicago, Illinois.

60. Jackson was the one responsible for terminating Gordon, as her July 24, 2020 letter indicated, which she had authority to do, as was and is consistent with CPS policy, custom, and protocol. Jackson also sent and approved the charges filed against Gordon. As regards hiring and firing decisions, she had – both legally and practically – final decision-making authority.

61. Defendant Bogdana Chkoumbova (“Chkoumbova”) is the Chief of Schools Officer for Chicago Public School. Defendant Chkoumbova is being sued in her official capacity as a person who, acting under color of state law, deprived Plaintiff of his constitutional rights, and in her individual capacity as a tortfeasor. Defendant Chkoumbova maintains an office at 110 N. Paulina, Chicago, Illinois.

62. Chkoumbova spoke at the Meeting, and on information and belief, made false statements to the press and others about Gordon.

63. Defendant Laura LeMone (“LeMone”) is the Network Chief of District 14, which includes the School. Defendant LeMone is being sued in her official capacity as a person who, acting under color of state law, deprived Plaintiff of his constitutional rights, and in her individual

capacity as a tortfeasor. Defendant LeMone maintains an office at 110 N. Paulina, Chicago, Illinois.

64. LeMone spoke at the Meeting, sent false communications to the Lincoln Park community (including her June 23, 2020 letter), and on information and belief, made false statements to the press and others about Gordon.

65. Defendant Jadine Chou (“Chou”) is the Chief of Safety and Security for the Chicago Public Schools. Defendant Chou is being sued in her official capacity as a person who, acting under color of state law, deprived Plaintiff of his constitutional rights, and in her individual capacity as a tortfeasor. Defendant Chou maintains an office at 42 W. Madison Street, Chicago, Illinois.

66. Chou spoke at the Meeting, and on information and belief, made false statements to the press and others about Gordon.

67. Defendant Michael Passman (“Passman”) is the Chief Communications Officer for the Chicago Public Schools. Defendant Passman is being sued in his official capacity as a person who, acting under color of state law, deprived Plaintiff of his constitutional rights, and in his individual capacity as a tortfeasor. Defendant Passman maintains an office at 42 W. Madison Street, Chicago, Illinois.

68. On information and belief, Defendant Passman attended the Meeting and conferred with the other individual defendants on how to run the Meeting and what to say at the Meeting, and both before and subsequent to the Meeting, made false statements to the press and others about Gordon.

69. Defendant Debra Spraggins (“Spraggins”) is the Director of Investigations at the Office of Student Protections for the Chicago Public Schools. Defendant Spraggins is being sued in her official capacity as a person who, acting under color of state law, deprived Plaintiff of his

constitutional rights, and in her individual capacity as a tortfeasor. Defendant Spraggins maintains an office at 110 N. Paulina, Chicago, Illinois.

70. Spraggins spoke at the Meeting, and on information and belief, made false statements to the press and others about Gordon.

71. Defendants Jane and John Doe are as-yet-unknown employees of CPS who made defamatory statements regarding Plaintiff.

72. All Defendants except for LeMone and Spraggins are part of CPS' senior leadership team as listed on CPS' website: <https://www.cps.edu/about/leadership/executive-leadership/>.

73. Defendants are responsible for setting and implementing policy for CPS.

JURISDICTION AND VENUE

74. This action arises under the Constitution and laws of the United States, including 42 U.S.C. § 1983. Jurisdiction is conferred upon this Court pursuant to 28 U.S.C. §§ 1331, 1343, and 1367.

75. To the extent necessary, this Court also has jurisdiction to issue any declaratory relief pursuant to the Declaratory Relief Act, 28 U.S.C. §§ 2201, 2202.

76. Venue is proper in the Northern District of Illinois pursuant to 28 U.S.C. § 1391(b). The Defendants maintain offices within the Northern District of Illinois, and all relevant events occurred and will occur in the Northern District of Illinois.

FACTS

Who is Pat Gordon?

77. Pat Gordon is 40 years old and a Chicago native.

78. Pat was raised by his single mother in a one bedroom apartment in the Uptown neighborhood. His mother recently died of Covid, dying tormented that her son had been falsely accused, terminated, and was unemployed because of CPS' actions.

79. Pat is a CPS graduate, graduating from Senn High School in 1998.

80. At Senn, Pat was an honor student.

81. At Senn, Pat was class president.

82. At Senn Pat was president of the National Honor Society.

83. At Senn Pat was captain of the football, wrestling, and track teams for both his junior and senior years.

84. At Senn Pat was a member of the percussion ensemble and band.

85. In high school, Pat also volunteered for the Chicago Park District, which awarded him its “Citizen of the Year” for his grades and his work with younger kids.

86. Separately, in high school Pat also worked at the McCormick Boys’ and Girls’ Club in Uptown (the “Club”), which awarded him its “Youth of the Year” award, the highest honor it awards each year.

87. The Club also awarded him a partial college scholarship, without which he could not have attended college.

88. Pat was recruited to play football at Elmhurst College, where he played and attended for two and one half years (1998-2001).

89. While working full time, Pat then obtained his bachelor’s degree in Psychology from Northeastern University, where he graduated *magna cum laude*.

90. As a kid raised poor by a single mother, Pat’s passion was – and remains – helping our youth.

Coach Gordon’s Unblemished Coaching Record

91. From 2001-2006, Pat worked full time at the Club instructing kids, mentoring kids, and leading and coaching their teams. Pat was lauded and promoted for his work at the Club.

92. During this time he also coached elite AAU basketball, meaning elite high school basketball players that primarily played and travelled during the summer.

93. Because of his stellar work and growing reputation, in 2006, at just the age of 25, Pat was recruited to coach basketball at Lincoln Park High by veteran coach, Tom Livatino. Livatino was then the boys' varsity basketball coach at the school.

94. From 2006-2010, Pat assisted Livatino, while also coaching the sophomore team.

95. During this time, Pat also coached the boys' volleyball team at the school.

96. In 2010, Livatino was offered, and accepted, the prominent position of boys' varsity basketball coach at Loyola Academy in Wilmette.

97. As Livatino had been so impressed with Pat's work at Lincoln Park, he asked Pat to join him on his staff at Loyola. Pat agreed, and joined the Loyola staff as the assistant boys' varsity basketball coach.

98. Loyola quickly became so impressed with Pat, that in 2013 it also offered him a position working at the school as a security officer and *de facto* student counselor and mentor.

99. Then, in 2015, Pat was recruited back to Lincoln Park to lead its boys' varsity basketball team. Pat was recruited back by Brian Murphy, the school's longtime athletic director who knew Pat and his work from Pat's prior four years assisting Livatino and coaching boys' volleyball at the school.

100. Although it was a large pay cut for Pat and he enjoyed his time coaching at Loyola with Coach Livatino, Pat took the job for one reason: because he wanted to make an impact on inner city kids like himself.

101. And Pat immediately did so.

102. When Pat took over the program, it had a losing league record the previous season.

103. But in just a few short years Pat built the program into a powerhouse, being ranked one of the top teams in the state.

104. As the *Chicago Sun Times* reported January 9, 2020, the day after CPS suspended Coach Gordon: “He’s 86-46 in five seasons and has turned the program into a city powerhouse.”
<https://chicago.suntimes.com/2020/1/9/21058539/high-school-basketball-coach-suspended-lincoln-park-pat-gordon-cps>

105. The leaders at Lincoln Park were so impressed with Pat – not just on the basketball court but off it too – that in 2018 the principal, Michael Boraz, offered Pat a full time position as safety officer, so Pat then not just coached at the school, he worked there full time too.

106. Pat was respected and beloved at the school by players, students, parents, teachers, and staff.

107. In the near decade Pat coached and worked in CPS, no player, parent, coach, teacher, or administrator ever made or filed a complaint against him.

108. Many former players still contact and reach out to Coach Gordon, considering him a lifelong friend and mentor.

109. Pat is a deeply moral, thoughtful, earnest, and righteous (but not self-righteous) human being.

110. Pat is not a public figure.

111. Until the actions discussed in this case, Pat led a very private life.

112. This is Pat Gordon with some of his former players after a game:



The Detroit Authorized, not “Unauthorized,” Holiday Tournament

113. In the 2018-2019 season, Pat’s fourth leading the program, the team garnered much attention. It was a young team that went 23-8 and was ranked high in the state.

114. As such, the 2019-2020 team had high expectations. Coach Gordon wanted to give his kids just a small taste of the opportunities kids at suburban schools like Loyola, and at other high profile city programs like Simeon, enjoy, so he searched for tournament opportunities.

115. Originally Coach Gordon organized to get the team to play in a tournament in Orlando over the Christmas break, but ultimately cost and logistics were too much, so he instead organized to have the kids attend the “Roundball Classic” in Detroit from December 27-29, 2019.

116. On December 12, 2019, after being requested by the assistant principal to do so, Coach Gordon timely turned in the necessary paperwork to attend the tournament, which he e-mailed to both Assistant Principal Brumfield and Principal Thuet.

117. Thereafter he saw the principals on multiple occasions, and neither said anything more was necessary to attend the tournament. Both principals were new to the school that year, and for Principal Thuet, it was his first year as a principal, and he was there on an “interim” basis.

118. The trip was well-known, publicized, and anticipated by the players, parents, and entire school community. Media reports and websites mentioned it. Nothing whatsoever was hidden about the trip. Quite the contrary, Coach Gordon and the team were open and vocal about the trip, the team’s first-ever out of state under Coach Gordon’s tutelage.

119. Besides Coach Gordon and two assistant coaches, at least five parents volunteered to chaperone, help supervise, and drive to Detroit with the players. It was just a two night trip over the holiday weekend, from Friday December 27 to Sunday December 29, 2019.

120. The team was scheduled to play three games in three days, and to save on expenses, they left on Friday morning, since their first game was not until 8:00 pm that night.

121. Considering himself more a “life coach” than a basketball coach, Coach Gordon spent weeks prior organizing a jam-packed schedule during the three days. Not a minute during the three days was unaccounted for. Besides practice and games each day, Coach Gordon organized many activities for the kids, and distributed a detailed schedule of events to players and parents days *before* the trip. **Exhibit 5**.

122. For instance, on Saturday, December 28, 2019, Coach Gordon arranged for the team to visit the Detroit Pistons NBA facilities, where they toured, practiced, and received mentoring. *Id.* It was a once-in-a-lifetime experience for the players.

123. The team ate all meals together.

124. The team, managers, and parents stayed together at the Victory Inn in Southfield, Michigan.

125. As any player or coach will attest, Coach Gordon, though quiet, is a strict disciplinarian. He runs a tight ship both on the court and off. He does so because, as he tells his players, he is “preparing them for life, not just basketball.” He means it and lives the values he preaches.

126. Coach Gordon, as he always does, set and enforced strict protocols for the trip.

127. Upon arrival in Detroit, Coach Gordon handed out room assignments – 3 players per room – meaning Coach Gordon made the room assignments (not the kids).

128. Coach Gordon even organized with the hotel for chaperone and parent rooms to be next to player’s rooms so the team could be monitored as best as possible.

129. As there were two female student managers on the team, Coach Gordon organized for their room to be on the opposite wing of the hotel from the boys’ rooms, on different sides of the hotel lobby.

130. Coach Gordon arranged to have chaperones – including four team moms – sit in the hotel lobby until 1:00 am each night – long after the team’s 11:30 pm curfew – which the chaperones did. That way any students walking through the lobby could be seen and monitored. The moms sat together in the lobby monitoring both nights.

131. Each of the two nights Coach Gordon organized bed and curfew checks that he, the other coaches, and chaperones strictly enforced.

132. In sum, Coach Gordon organized and then implemented the most stringent-possible protocols – more stringent than any other overnight trip he had attended in all his years prior as an assistant coach or AAU coach.

133. Coach Gordon began each of the two mornings of the trip by checking in with each of his assistant coaches and chaperones who performed bed and curfew checks to hear if there were any reports from the night before.

134. On December 28, 2019, the first morning waking in the hotel, all chaperones and coaches reported no incidents from the night prior.

135. On the second morning, December 29, 2019, which was the day of departure, one of the assistant coaches reported two *minor* incidents from the night before.

136. The assistant coach reported that in one room, one of the boys – “Player A” – continued to play video games after he had been told to stop, and that in another room, two boys continued to talk after being told to stop.

137. Although the incidents were relatively minor, Coach Gordon – as he does with all team matters since he is a strict disciplinarian – treated it seriously. He gathered the team in the morning and quickly told the team what happened, that he was disappointed, and that there would be a consequence. His goal was to make it a teachable moment for the kids.

138. Shortly after, at the team’s morning shoot-around practice before their final game that afternoon, Coach Gordon took the three players aside and told them that they would sit out the first half of the team’s game later that day.

139. One of the three players Coach Gordon disciplined was his godson with whom Coach Gordon lives. Coach Gordon never played favorites and imposed discipline blindly, the same for all, no matter whether it was his godson, the team’s star player, or anyone else. Coach Gordon, without hesitation, disciplined his own godson on the trip for a most minor infraction.

140. But in imposing the modest discipline – sitting out the first half of the game later that day – Player A (the one playing video games the night prior after being told to stop) immediately mouthed off at the coaches.

141. Player A yelled at the Coaches and said “that sh-t is stupid.”²

142. Without hesitation Coach Gordon then calmly said to Player A – as he would any player – “you have now earned yourself a two game suspension.”

143. The team played later that day and beat a powerhouse team without Player A in the line-up.

144. During the game, however, Coach Gordon was impressed with Player A for how he supported his teammates. Player A did not pout and was a good teammate during the game.

145. As a result, immediately after the game in the locker room, Coach Gordon took Player A aside and told him that he was impressed with his maturity during the game, and that his two game suspension was now reduced to one game, so his suspension was over.

146. As he usually did, Coach Gordon had tried to make the experience a teachable moment for Player A.

147. That is the type of coach – and human being – Coach Gordon is.

148. After the game, the team – in its parent-led caravan – drove home to Chicago, arriving around 10 pm without incident.

149. Coach Gordon considered it a successful, action-packed trip. The team went 2-1 playing stellar, national competition, but as important, the team bonded and the kids enjoyed some once-in-a-lifetime experiences.

150. Other than the minor incidents reported, Coach Gordon was not informed of, and did not know of, any other disciplinary problems or incidents. No player, manager, coach, parent, hotel staff, or anyone else reported anything, nor did Coach Gordon witness or suspect any inappropriate conduct by anyone.

² As discussed further below, in his subsequent interview with CPS investigators, Player A admitted he had sworn and that he was belligerent with the coaches.

After the Trip (December 31-January 8, 2020)

151. As the team had returned late Sunday, December 29, 2019, Coach Gordon had no organized team activities the next day, and he had no contact with the team that day.

152. The following day, Tuesday, December 31, 2020, Coach Gordon went to the school to watch film and prepare for the second half of the season.

153. About 4:00 pm that afternoon while still at the school, Principal Thuet called Coach Gordon stating that he – Thuet – had received a call from a principal at another CPS school.

154. Principal Thuet said that the other principal was told by a “parent not on the trip” that some students on the trip allegedly engaged in sexual activity the last night of the trip and perhaps recorded it.

155. Coach Gordon told Principal Thuet the simple truth: he knew nothing about it, and that he was shocked to hear there could be any such activity or allegations.

156. The conversation was relatively short, and ended with Principal Thuet saying he would be back in touch.

157. During their short conversation Principal Thuet also made reference to the trip being “unauthorized,” and Coach Gordon reminded Principal Thuet that he had, in fact, returned the requested forms (and even had cc’d Principal Thuet when doing so). That was the first time Coach Gordon ever heard the trip characterized as “unauthorized.”

158. It was New Year’s Eve, and Coach Gordon was dumb-founded when he hung up. He was given no guidance on what to say or do. Principal Thuet did not tell him who made the allegations or any specifics about who was allegedly involved, though he may have mentioned one player by name as allegedly “being involved.”

159. As it was the holiday break, it was difficult for Coach Gordon to gather any information.

160. One player told Coach Gordon that day, “Coach, I heard there’s a rumor I had sex on the trip, but I want you to know, I didn’t.” Coach Gordon responded: “Ok, but you know if you or anyone did their season is over.” It was a short conversation.

161. As any former player of his will attest, Coach Gordon has a zero tolerance policy for misconduct. Coach Gordon would – and as he had in the past – bench his star player for misconduct, just like he did his own Godson in Detroit.

162. When school resumed on Thursday, January 2, 2020, the team held its scheduled practice that day and the next day (Friday). The team’s next game was not scheduled until Wednesday, January 8, 2020.

163. During the practices Coach Gordon did not mention anything to the team or question any players. He conducted “regular” practices, though he discussed it with the assistant coaches, again with nobody providing Coach Gordon concrete information or evidence of wrongdoing.

164. After Principal Thuet contacted Coach Gordon on new year’s eve and had their short conversation, Coach Gordon did not see or hear further from Principal Thuet until Monday, January 6, 2020. Still concerned, confused, and lacking information, Coach Gordon proactively approached Principal Thuet in the hallway and asked him if there were “any updates?” Principal Thuet responded, “no updates coach, will let you know.” Coach Gordon held regular practice that day (Monday) and the next day (Tuesday).

165. The next morning, Wednesday, January 8, 2020, Principal Thuet summoned Coach Gordon to his office and handed him a suspension letter, suspending Coach Gordon as both coach and security officer at the school. **Exhibit 6**.

166. The conversation was short, with Principal Thuet saying words to the effect of, “I just received this letter from downtown, sorry Pat, it’s out of my hands.”

167. Other than the suspension letter he was handed, Coach Gordon was not given any guidance on what communication he could or should have with the team or the other coaches.

168. The suspension letter tells Coach Gordon to stay off school property. It does not prohibit or instruct him not to have contact with players or coaches. *Id.*

169. From the time the team returned from Detroit until the time Coach Gordon was suspended on January 8, 2020, the team had no games.

170. As such, it would have been impossible to “retaliate” against any player by reducing his playing time – which Coach Gordon would never do – since no games were played.

171. Coach Gordon was replaced on an interim basis by one of his assistant coaches, Donovan Robinson, who had *not* attended the Detroit trip.

172. Coach Robinson was a dean at another CPS high school (Michele Clark).

173. Robinson’s son played on the team the previous year (2018-19) and graduated.

174. Coach Robinson, who had assisted the team for years, was not even going to assist again in 2019-2020, but he agreed when some of the returning players asked him to coach one more year.

175. But because he worked at another far-away school and because his son had graduated, Coach Robinson had only attended half of the team’s games to date that season.

176. Principal Thuet, the interim principal in his first year at the school, asked Coach Robinson to take over for the remainder of the season as head coach because a few years prior, when Principal Thuet was a student principal at the school, he worked with and observed Robinson install “rehabilitative justice” practices that transformed the school.

177. Coach Robinson reluctantly said “yes,” that he would step up to lead the team the rest of the season *not* because he wanted to be head coach, but because he wanted the kids to finish the season and have a good experience. He also did so because based on how Principal Thuet

framed the request, Robinson thought, hoped, and expected that Coach Gordon would be back in a matter of days.

178. But because Coach Robinson had only attended half the team's games – and because when he attended he was more a morale booster than an on the bench x's and o's coach – he was unfamiliar with the team's line-ups, play-calling, and game details.

179. After Coach Gordon was suspended, he did *not* attend any team games.

180. After Coach Gordon was suspended, he did *not* tell Coach Robinson who to play.

181. The only game-related activity Coach Gordon did after he was suspended is he meticulously prepared – as he always did – a detailed breakdown of the opponent, which he emailed to Coach Robinson.

182. Of course, a number of players and parents immediately reached out to Coach Gordon because they were upset, confused, and disturbed that he was suspended, and they offered him support and encouragement.

183. When they did so, Coach Gordon was polite but brief, encouraging them in return to keep playing and preparing hard. He told them not to worry about him. Coach Gordon did not share information about his case or any underlying incidents with them (or anyone) because he had none. He was in the dark and as confused as anyone.

184. To this day, Coach Gordon has never been presented any tangible evidence of what allegedly transpired on the trip. If there was a video, to this day he has never seen it.

185. To this day, no player has ever told him or acknowledged what any player did.

186. To this day, Coach Gordon has only heard second, third, or fourth-hand accounts of what may have allegedly happened. To this day no one has ever “confessed” to Coach Gordon about anything. To this day, Coach Gordon remains in the dark.

The “Investigation”

187. Not until January 17, 2020 – nine days after he was suspended – did CPS’ Office of Student Protection (“OSP”) interview Coach Gordon. The interview lasted approximately two hours, and Coach Gordon openly answered all their questions.

188. The OSP investigators told (not asked) Coach Gordon that the trip had been “unauthorized,” that he had failed to report student sexual activity on the trip, and that he had mishandled the subsequent investigation when the team returned, which charges were and are false.

189. The OSP investigators did not know that Coach Gordon had returned the requested paperwork to the principals before the trip, and they were surprised when he said so.

190. Under Interim Coach Robinson’s leadership, the team went a perfect 7-0, rising to the top ten in the state rankings.

191. Next, late in the afternoon on Friday, January 31, 2020, without warning or notice, CPS “suspended” the team’s season and terminated and suspended the other four members of the Lincoln Park Six.

192. Defendant Laura LeMone sent the entire School community a letter by email stating: “I would like to invite you to a meeting with parents and families on Monday, February 3 at 6 p.m. to discuss the school leadership change and transition plans.” **Exhibit** 7.

193. CPS’ actions instantly garnered not just local, but national attention.

194. That night, Friday, January 31, 2020, the story was the lead story for all the local television stations with reporters reporting live from the school. For instance, NBC led off its 10 pm broadcast live from the school with the “shocking report from Lincoln Park High School,” a clip of which can be viewed here: <https://www.nbcchicago.com/news/local/basketball-season-suspended-principal-removed-at-chicagos-lincoln-park-high-school/2211353/>

195. The live report mentions Pat Gordon by name, as do all the reports.

196. Here is the link to the WGN report naming Gordon as being removed for misconduct: <https://wgntv.com/news/basketball-teams-season-suspended-staff-removed-over-misconduct-allegations-at-lincoln-park-high-school/>

197. Here is CBS's, which calls it a "bombshell" "sex scandal" and states Pat Gordon's name repeatedly: <https://chicago.cbslocal.com/2020/01/31/lincoln-park-high-school/>

198. There were dozens of print and broadcast reports that night and over the weekend detailing the allegations and identifying "Coach Pat Gordon" by name and stating he had been removed for "misconduct."

The Community Meeting Monday Night: CPS' Repeatedly Defames Coach Gordon

199. Three days later, on Monday night, February 3, 2020, the public Meeting took place in the School's auditorium and was standing room only. Multiple press outlets attended with some news stations reporting live and again reporting the Meeting that night as the lead story on the 10 pm local newscasts.

200. Defendants LeMone, Chou, Spraggins, and Chkoumbova all spoke and addressed the audience.

201. They spoke and presented for about 90 minutes before fielding questions.

202. In making their presentation, they used a powerpoint, which they magnified on the auditorium's screen for all to see. **Exhibit 1.**

203. At the meeting they restated and confirmed the terminations and suspensions of the Lincoln Park Six. During the course of the Meeting, they identified or confirmed Coach Gordon by name.

204. Regarding the boys' basketball team, there was a timeline slide presented stating that on January 2, 2020: "Office of Inspector General (OIG) receives a report of misconduct

involving the team on a recent “unauthorized” boys’ basketball overnight trip, and begins its first investigation.” *Id.* at 5.

205. The statement is false. The trip was not unauthorized.

206. The powerpoint and Defendants’ statements made at the Meeting did not state that the listed infractions were “alleged,” but instead stated and inferred that they had in fact occurred.

207. For instance, the first slide about the boys’ basketball team says: “While conducting the investigation, OSP finds additional serious policy violations and failures to follow proper protocols by adults to ensure student safety.” *Id.*

208. The “timeline” also states that on January 14, 2020, “OSP receives a new, separate complaint of alleged sexual misconduct and initiates a new second investigation.” *Id.* at 6. This statement does not state or differentiate whether the “alleged sexual misconduct” was committed by an adult or student. LeMone, Chou, Spraggins, and Chkoumbova stated or inferred that this statement related to the boys’ basketball team.

209. But in fact, the statement and the “second investigation” referenced were not related to the boys’ varsity basketball team. The statements or inferences indicating so were false.

210. The powerpoint repeatedly referenced “sexual misconduct” and “adult misconduct.” *Id.* at 9.

211. At the Meeting, LeMone, Chou, Spraggins, and Chkoumbova repeatedly stated – often in response to audience questions – that there was not only alleged “student on student” misconduct, but also alleged “adult on student sexual misconduct.”

212. They emphasized the point to make clear that some adults were not only accused of mishandling alleged “student on student” misconduct, but that some adults themselves were accused of committing “adult on student sexual misconduct.” But when they did so, they did not distinguish or make clear which of the Lincoln Park Six was accused of the more serious charge

of “adult on student sexual misconduct,” leaving the *misimpression* that Coach Gordon was alleged to have committed “adult on student sexual misconduct.”

213. Not only would any allegation of “adult on student sexual misconduct” be false as regards Coach Gordon, there were – in fact – *no* credible allegations of “adult on student” misconduct made against of the Lincoln Park Six.

214. Instead, CPS had *mischaracterized* one *non*-sexual allegation against an adult as instead being a “sexual” allegation committed by the adult against a student.

215. No adult – none of the Lincoln Park Six – committed any sexual misconduct.

216. Even so, at the Meeting, LeMone, Chou, Spraggins, and Chkoumbova stated or inferred that some of the alleged “adult on student sexual misconduct” related to the boys’ basketball team and was committed or was alleged to have been committed by Coach Gordon.

217. Based on Defendants’ statements at the Meeting and powerpoint, attendees at the Meeting were left with the firm – but false – impression that at least Pat Gordon, as coach of the boys’ basketball team, was accused of “adult on student sexual misconduct,” which is false.

218. Pat Gordon was never accused of committing “adult on student sexual misconduct.”

219. Pat Gordon never committed “adult on student sexual misconduct.”

220. Pat Gordon never committed any misconduct, sexual or non-sexual.

CPS’ Defamatory Statements Go Viral

221. Defendants’ false statements made at the Meeting were immediately reported and broadcast on the 10 pm local news that night.

222. In the days and weeks after the Meeting, many print and broadcast media outlets reported about the Meeting and rebroadcasted the false statements Defendants had made about Coach Gordon.

223. For instance, a *Chicago Tribune* article dated February 3, 2020, posted before the Meeting, states: “the unidentified staff member in the Jan. 9 letter was Gordon, a source told the Tribune.” **Exhibit 8.**

224. In a story dated February 7, 2020, the *Chicago Tribune* reported that “district officials” stated that Gordon took the team on an “unauthorized” trip. **Exhibit 9.**

225. The article also (falsely) states that “A CPS official later clarifies the adults referenced included boys basketball coach Pat Gordon and two adults who helped out with the team ‘but were not staff members and did not complete the district's volunteer application process as required,’ and were prevented from participating in school activities.” *Id.*

226. On information and belief, the *Chicago Tribune*’s unnamed source(s) included the Defendants.

227. As reported in a *Chicago Sun Times* story dated February 3, 2020 immediately after the Meeting ended: “CPS Chief of Schools Officer Bogdana Chkoumbova told a packed school auditorium that students had been harmed ‘physically’ and ‘emotionally, said Chkoumbova.” **Exhibit 2.**

228. The article notes: “The presentation did not provide extensive details of the incidents or allege who was specifically involved.” *Id.*

229. In a story the next day, February 4, 2020, the *Chicago Sun Times* states that “CPS suspended the team’s head coach, Pat Gordon,” and goes on to reference “multiple allegations of sex misconduct.” **Exhibit 10.**

230. The article quotes Defendant Passman. *Id.* The article states: “CPS officials said at a meeting with parents and students Monday night that there are multiple investigations into allegations of sexual misconduct, retaliation against witnesses, lying to families and financial mismanagement of the athletics program.” *Id.*

231. Relatively minor in comparison to the outlandish sexual misconduct allegations, Passman's statement is also false in stating that there were allegations of lying to families and financial mismanagement.

232. Gordon's removal, as well as the removal of the principals and other coaches, garnered local, regional, and even national and international attention. At least one person reported learning of the story while watching WGN television in Mexico on or about January 31, 2020.

233. For instance, in a story dated February 4, 2020 that ran nationally, the Associated Press reported: "At a meeting Monday night in a packed Lincoln Park High School auditorium, Chicago Public Schools officials listed allegations of misconduct and dishonesty that seemed more akin to an athletic scandal at a major university than at a high school in a well-to-do neighborhood on Chicago's North Side." **Exhibit** 11.

234. The article continues: "The probe revealed what the CPS termed 'egregious and systemic policy violations' that led to the suspension of basketball coach Pat Gordon days later." *Id.* The article named only person accused of doing something wrong: Pat Gordon. *Id.*

235. Each and every statement made by Defendants stating or inferring that Pat Gordon was suspended as basketball coach because he allegedly engaged in improper sexual misconduct with a student is false. Gordon committed no sexual misconduct and no such allegation against him was ever made against him.

236. Defendants issued multiple (false) statements over multiple days in multiple outlets to multiple sources stating or inferring that Coach Gordon took an unauthorized trip to Detroit, where he failed to properly supervise students who had sex, and then when returning impeded the investigation and retaliated against a player. The result was that millions of people read or heard Defendants' (false) statements about Coach Gordon.

237. Defendants also made their false statements about Coach Gordon to Alderman Michele Smith, who in turn publicly supported CPS' actions at the time – i.e., terminating and suspending the Lincoln Park Six– based on the false statements Defendants made to her.

OSP's Investigation

238. CPS' Office of Student Protection (“OSP”) led the investigation of the (false) charges against Coach Gordon, which it combined with its investigation of the two terminated principals, Dean Johnson and Robinson).

239. OSP did not conduct Larry Washington's investigation because of a conflict. Instead CPS' Office of Inspector General (“OIG”) – a truly separate, independent agency – did. OIG fully absolved Washington of any and all serious charges.

240. Not until his hearing was set in late June did CPS give Gordon an undated document called “Executive Summary” (the “Summary”).

241. The Summary combines all five cases – Gordon, Robinson, Johnson, Thuet, and Brumfield – into one, ten page summary. Actually, the Summary combines more than five cases, as it also makes “conclusions” about several other unnamed individuals.

242. In so doing, the Summary haphazardly and clumsily combines all five cases. It also confusingly fails to differentiate who is accused of what, what “proof” applies to which person, and even what the exact allegations are.

243. Coach Gordon was never able to question the witnesses who provided statements.

244. The Summary is also highly redacted so readers cannot identify individuals.

245. The Summary has, literally, dozens of self-contradictions, meaning the “conclusions” in the Summary contradict the underlying investigative notes and witness statements.

246. Created in 2019, OSP has a mandate to quickly fix CPS' historic problem of not protecting kids. But in this case, it sought to accomplish its mandate by mixing heavy-handed unsupported action – mass terminations and suspensions – with defamatory statements. The former may be permissible, but the latter is not, especially when it results in effectively terminating the employee not just from CPS, but all employment.

247. On information and belief, some OSP employees refer to OSP as the “Office of Secret Prosecutions,” not the “Office of Student Protections.”

Player A and his Father

248. Player A transferred to the school as a sophomore in March 2019 after having attended at least two other high schools prior. Lincoln Park was at least his third high school before his sophomore year was completed.

249. At his most recent high school, Player A – and his father – were upset with his lack of playing time and repeatedly voiced displeasure to the coaches there.

250. In summer 2019, Player A played on Lincoln Park's summer league team coached by Coach Gordon.

251. Right off the bat with the summer league team, Player A and his father complained about Player A's playing time.

252. On multiple occasions, starting with summer league play, Coach Gordon – but even more so the other coaches – had to field complaints and demands from Player A's father about his son's lack of playing time during summer league games.

253. The father was clear that he thought Player A was a “Division 1 scholarship player” and that Coach Gordon and the other coaches “should treat and develop him as a star player.” The father routinely and boldly made such statements and complaints in front of other parents and coaches.

254. On information and belief, Player A has a brother about three years older than Player A who also played CPS basketball in high school and who, on information and belief, had cycled through at least four high schools during his career, including transferring to a school in Texas where his grandmother lived, all at the father's direction and doing.

255. Same as the father did with Player A, the father badgered his older son's coaches at each school he attended.

256. Before the Detroit trip (and in Detroit), Player A was not a starter. Nor was he the "sixth man," or even the "seventh man." He was a role player on the team. He often played about half the game, but against good teams or in close games, he played little.

257. For instance, against Orr High School on December 11, 2019 and against Whitney Young High School on December 13, 2019 – two close, high-profile games the team won against high profile competition *before* the Detroit trip – Player A played few minutes.

258. Player A did not lead the team in any statistical categories. He was not even second or third in any statistical categories. He had a bad attitude and was lackadaisical and late to many practices, requiring prompting and motivation by the coaches.

259. Like he did with all players – and no matter Player A's father's complaints and badgering – Coach Gordon made all playing decisions concerning Player A based on the merits.

260. On information and belief, when Coach Gordon suspended Player A on December 29, 2019 in Detroit for his misbehavior, Player A immediately called his father (who was not on the trip) and complained. The father then called an assistant coach and complained about Coach Gordon, threatening that "he can't treat my son that way and get away with it," or words to that effect.

261. Coach Gordon was suspended the morning of January 8, 2020. Later that day the team had its first game since returning from Detroit, an away game at North Lawndale.

262. Coach Gordon did not attend the game, or any games after he was suspended.

263. It was a close game that the team won in overtime.

264. At the game, Player A's father approached and confronted the new (interim) head coach, Donovan Robinson and an assistant coach and angrily voiced displeasure over playing decisions. He said: "F-ck Pat. I got something for LP." He then threatened them saying: "What happened to Pat can happen to you too." The reference to "LP" meant the school, Lincoln Park High School.

265. OSP interviewed Player A on January 7, 2020, the day before Coach Gordon was suspended. Player A's father attended the interview.

266. During his interview, Player A stated that in Detroit: (a) multiple bed checks were performed each night by coaches lasting until 1:30 am; (b) he did play video games after being told to stop by the assistant coach during curfew checks; and (c) he did mouth off to Coach Gordon when Coach Gordon instilled minor discipline stating, "that sh-t is stupid."³

267. After Coach Gordon was suspended on January 8, 2020, Player A missed at least half of the team's remaining games and many practices.

268. Player A was absent from school at least five days between January 8 and January 31, 2020, including on many game days.

269. Long before the Detroit trip, Player A was struggling in school. The semester ended on or about January 31, 2020.

270. Any allegation that Coach Gordon instructed Coach Donovan to not start Player A is both wrong and nonsensical. Before the Detroit trip Player A was not a starter. Moreover, Player A missed at least half the team's remaining games after the team returned from Detroit and was ill.

³ The statements come from OSP's Report.

271. On information and belief, long before the Detroit trip, Player A's father sent emails to the CPS' Region Athletic Director complaining about his son's playing time.

272. On information and belief, Player A's father levied his false claims against Coach Gordon, Interim Coach Robinson, Principal Thuet, Assistant Principal Brumfield, and Dean Johnson in an attempt to manufacture a basis for transferring his son to another CPS school midseason and still be allowed to play, which is normally prohibited. Since such transfers are only allowed for "safety" reasons, Player A's father needed to manufacture a "safety" reason for his son to transfer.

273. To be clear, neither Player A nor his father ever made any accusations that Player A was harmed or mistreated on the Detroit trip.

274. The only ones who committed any "misconduct" on the Detroit trip to Coach Gordon's knowledge were Player A (for playing video games after curfew and mouthing off to the coaches the next day) and two other players (for talking after curfew).

The Fall Out

275. Sadly, Player A's father's plan succeeded. CPS took the (false) bait and suspended Gordon, suspended his replacement, Robinson, suspended the team's season, suspended the dean, John Johnson, and fired the two principals – 5 lives forever ruined along with a team's dreams dashed, and a school and community torn apart.

276. Two months later, CPS quietly reinstated Dean Johnson.

277. Five months later – in late June just *after* the school year ended – CPS quietly reinstated Coach Robinson (and separately reinstated Larry Washington, the girls' coach).

278. But because CPS would have too much egg on its face if it had reinstated all three of the coaches and dean it suspended, it needed to terminate at least one, so it terminated Coach Gordon.

279. In so doing, CPS sent the community another letter that confusingly combined Coach Gordon's status with Coach Robinson and Coach Washington. **Exhibit** 12. The letter falsely states that CPS "substantiated multiple allegations of serious misconduct at Lincoln Park High School." *Id.*

280. In July 2020, CPS completed its deed and terminated Coach Gordon through its sham hearing process.

281. On information and belief, Player A briefly transferred to Texas – the same school his older brother transferred to a few years earlier – and lived with his grandmother.

282. On information and belief, Player A returned to Chicago for the 2020-2021 school year, meaning Player A began his junior year attending at least his fifth high school.

283. The two principals – who had been fired on the spot on January 31, 2020 without notice or warning – sued CPS and its officials in federal court, which case remains pending after the federal judge denied CPS' motion to dismiss the case. *Thuet et al. v. Chicago Public Schools*, No. 20 C 1369 (N.D. Ill.) (J. Feinerman).

Other Lingering Questions

284. On information and belief, Player A's mother is a CPS principal.

285. On information and belief, Player A's mother or father, either directly or indirectly, contacted Janice Jackson – CPS' Chief Executive Officer (CEO) – on or about December 30, 2020, the day after the team returned from Detroit, to discuss the (false) allegations about the Detroit trip.

286. On information and belief, CEO Jackson learned of the (false) allegations before Coach Gordon and before Principal Thuet.

Damages

287. Because of his termination from LPHS and the related mass publicity, Coach Gordon's life and career have been destroyed.

288. Since he began coaching with Coach Livatino at age 25, Coach Gordon's goal was always to become a college coach.

289. Before CPS terminated and defamed him, Coach Gordon had started to have discussions with college programs about joining their staffs. He had even been contacted by some Division I coaches. Though he had yet to receive any firm offers, his path to a college position looked promising and was beginning to open up.

290. But the false statements made by Defendants and related publicity have ended all inquiries and discussions. Coach Gordon is now damaged goods in the coaching profession.

291. Even worse, because of Defendants' actions, words, and conduct, forget a college coaching job, Coach Gordon remains unemployed and mostly unemployable.

292. Because of Defendants' actions, words, and conduct, it is unlikely Coach Gordon will now ever coach Division I basketball, or be a head coach again at any level. Coach Gordon is virtually unemployable in the coaching field.

293. Coach Gordon has been ridiculed and shamed.

294. To be sure, some former players, parents, and peers – like Coach Livatino – who know the man and coach Gordon is, do occasionally call him voicing support and encouragement, which Coach Gordon appreciates. But for all others and those who do not know Coach Gordon, they assume the worst. They believe the defamatory statements Defendants published.

295. But what bothers and worries him most is what people don't say or think, meaning the quiet *misimpressions* they carry with them about his character that he has no opportunity to refute.

296. Because of Defendants' actions, the stellar reputation Gordon earned and garnered is now vastly diminished and decimated.

297. Since being suspended, defamed, and then terminated, Coach Gordon has suffered anxiety and depression.

298. Since being terminated, Coach Gordon has depleted his savings and, but for the kindness of friends and supporters, would risk being homeless.

299. Coach Gordon has not had full time employment since his termination and is virtually unemployable in all field commensurate with his work history, experience, and aptitudes.

[together, the damages specified *supra* ¶¶ 287-299, the “**Damages**”]

Jury Trial

300. Plaintiff requests a trial by jury for all issues and claims so triable.

COUNT I

42 U.S.C. 1983; Deprivation of Procedural Due Process
Against All Individual Defendants

301. The allegations of the preceding paragraphs are incorporated as though fully set forth herein.

302. Defendants deprived Gordon of his constitutionally-protected liberty interest in his occupation without providing the procedural protections required by the Due Process Clause of the Fourteenth Amendment. Defendants provided only a sham hearing, without providing Plaintiff any meaningful opportunity to deny, rebut, or contest the allegations and “witnesses” against him. As a result, Defendants did not just terminate Coach Gordon from his job at Lincoln Park High School, they terminated him from all meaningful, appropriate employment.

303. Because Defendants made false, stigmatizing statements to the public in connection with suspending and then terminating Coach Gordon, he was entitled to a meaningful hearing and review that would allow him to clear his name in a public forum, which Defendants denied.

304. Defendants destroyed Plaintiff's reputation in the most public of forums, but then quietly denied him due process and an ability to clear his name in its private, closed, rushed and hushed hearing forum.

305. Plaintiff has an important liberty interest in being free from false stigmatization at the hands of the government. Such harm arises in conjunction with Plaintiff's present and future inability to be employed as a coach or school employee on the same terms as other members of the public.

306. As described above, Defendants disseminated false public statements about Plaintiff that are sufficiently stigmatizing and derogatory to injure Plaintiff's good name and reputation in the community, and in fact did so.

307. Defendants made their false, stigmatizing statements in connection with terminating Plaintiff. Defendants' combination of publicly-disseminated stigmatizing statements about Plaintiff in connection with Defendants' high-profile public suspension and termination of Plaintiff gives rise to a claim under the Due Process Clause of the Fourteenth Amendment.

308. As detailed above, Defendants violations of Plaintiff's due process rights include:

- Failing to provide information of the charges against him;
- Failure to provide a meaningful hearing;
- Failure to conduct a meaningful or professional investigation;
- Failure to provide an independent hearing officer;
- Failure to conduct a meaningful hearing;
- Failure to provide any findings supporting the termination decision;
- Failure to consider the evidence presented at the hearing;
- Failure to provide an opportunity to interview, question, or cross-examine witnesses;
- Failure to provide any appeal mechanism, let alone any meaningful appeal mechanism;
- Failure to treat Plaintiff the same as similarly situated employees;
- Failure to impose discipline consistent with how CPS historically treats offenses; and
- Failure to provide a hearing in a public forum as due process requires after Defendants made numerous false statements stigmatizing Plaintiff to the public at-large.

309. Defendants deprived Plaintiff his right to liberty and property arbitrarily and purposefully, so as to offend fundamental notions of fairness and due process, in violation of the Fourteenth Amendment.

310. Reasonable officials in Defendants' positions would have known that their actions – notoriously defaming Plaintiff while denying him due process (i.e., “stigma-plus”) – violate clearly established constitutional rights to procedural due process.

311. Because of Defendants actions (and inactions), Gordon suffers the Damages specified above (*see supra* ¶¶ 287-299).

WHEREFORE, Plaintiff is entitled to declaratory judgment that Defendants' termination violated his constitutional right to due process; interim and permanent injunctive relief forbidding Defendants from enforcing their placement of Plaintiff on the Do Not Hire List; an award of actual damages; and such other and further relief as the Court deems just and proper. An apology would be nice too.

COUNT II
Defamation Per Se
Against All Individual Defendants

312. The allegations of the preceding paragraphs are incorporated as though fully set forth herein.

313. As detailed above, Defendants issued and made numerous statements stating, inferring, or suggesting that Plaintiff committed, or was alleged to have committed, sexual misconduct against a minor (the “Sexual Allegations”).

314. The statements include the statements made and slides presented at the February 3, 2020 Meeting, the numerous statements made and leaked to the media, the statements made to Alderman Michele Smith, and the June 23, 2020 letter sent to the LPHS community (each a “Statement” and together, the “Statements”).

315. The Statements are and were false.

316. Each Statement made by Defendants stating or inferring that Pat Gordon was suspended as basketball coach because of the Sexual Allegations is false. Gordon committed no sexual misconduct, and Gordon was never, in fact, accused of Sexual Allegations.

317. Separately, the Statements Defendants made concerning the Non-Sexual Allegations – i.e., that the trip was “unauthorized,” Gordon “retaliated,” or that Gordon “interfered” with an investigation – are false.

318. Defendants made each Statement willfully, wantonly, and purposefully – not negligently. Defendants knew exactly what they were doing when they made each Statement – assassinating Gordon’s character and destroying his life – and they knew exactly why they made each Statement: because Defendants (and CPS) needed to justify the (wrongful) actions they originally took and then mercilessly defended.

319. In making each Statement, Defendants acted with malice.

320. The Statements were not privileged. By acting recklessly, willfully, and wantonly, and because Defendants acted in bad faith when making the Statements, Defendants abused and defeated any privilege that might otherwise exist.

321. Because the Statements impugn (if not destroy) Plaintiff’s professional integrity in his profession and accuse or infer that he committed a heinous crime, the Statements are defamatory *per se*.

322. Because of Defendants actions (and inactions), Gordon suffers the Damages specified above (*see supra* ¶¶ 287-299).

WHEREFORE, Plaintiff is entitled to an award of damages totaling no less than \$5,000,000; an award of punitive damages; an award of attorneys’ fees and costs; and such other relief as the Court deems just and proper. An apology would be nice too.

COUNT III
False Light
Against All Defendants

323. The allegations of the preceding paragraphs are incorporated as though fully set forth herein.

324. If any of the Statements Defendants made were not false, the Statements were made publicly to portray Plaintiff in a false light – the false light being that Plaintiff committed “multiple” acts of “serious misconduct,” with some acts perhaps even being “sexual” in nature, which impression is false (the “False Light”).

325. Plaintiff committed no acts of serious misconduct, let alone any acts of sexual misconduct.

326. Defendants’ Statements that created the False Light were not just made publicly, they were broadcast and re-broadcast to mass audiences, with millions of people hearing, reading, or viewing the Statements.

327. A reasonable person would find the False Light that Defendants placed upon Plaintiff was highly offensive.

328. Defendants made their Statements with actual malice knowing their Statements would portray Plaintiff in the False Light, or alternatively, they made their Statements recklessly creating the False Light.

329. Because of Defendants actions (and inactions), Gordon suffers the Damages specified above (*see supra* ¶¶ 287-299).

WHEREFORE, Plaintiff is entitled to an award of damages totaling no less than \$5,000,000; an award of punitive damages; an award of attorneys’ fees and costs; and such other relief as the Court deems just and proper. An apology would be nice too.

COUNT IV

Intentional Infliction of Emotional Distress
Against All Defendants

330. The allegations of the preceding paragraphs are incorporated as though fully set forth herein.

331. It was extreme, outrageous, intentional, purposeful, and willful for Defendants to: (a) issue numerous knowingly false statements stating or inferring that Gordon committed, or was accused of committing, the Sexual Allegations, when such allegations were patently and objectively false and he had never been accused of same; (b) issue numerous knowingly false statements stating that Gordon had in fact committed the Non-Sexual Allegations, when such allegations were false; (c) leak false stories to the media; and/or (d) terminate Gordon not because of any findings actually made in relation to his conduct, but instead because CPS needed to fire someone to save face (together, the “Bad Acts”).

332. In committing their Bad Acts, Defendants intended to cause, or recklessly or consciously disregarded the probability of causing, Gordon severe emotional distress and the Damages specified above.

333. In committing their Bad Acts, Defendants’ actions and conduct directly and proximately caused, and continue to cause, severe emotional distress to Plaintiff (as well as the Damages specified above), and thereby constitute intentional infliction of emotional distress.

WHEREFORE, Plaintiff is entitled to an award of damages totaling no less than \$5,000,000; punitive damages; an award of attorneys' fees and costs; and such other relief as the Court deems just and proper. An apology would be nice too.⁴

Dated: January 29, 2021

Respectfully submitted,

/s/ William Choslovsky

William Choslovsky

Ari Rosenthal

Zenia Salles

Ginsberg Jacobs, LLC

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Counsel for Plaintiff

⁴ Based on the results of discovery, Plaintiff reserves the right to bring additional claims and amend as necessary.

EXHIBIT 1

Lincoln Park High School Parent Meeting

February 3, 2020

Meeting Agenda

- Introductions
- Meeting Norms
- Meeting Objectives
- Timeline of Events
- Summary of Investigations
- Upcoming Audits
- Support for People Affected
- LPHS Leadership Transition
- Questions

Meeting Norms

- The law and Board rules prevent us from disclosing information during an ongoing investigation, so we are **not able to answer questions about any individual who may be involved**
 - We will only be able to answer questions about the process and how we will move forward
- During the questions session:
 - Please be **respectful** of others throughout the meeting
 - Please **keep your questions brief** to allow everyone to speak
 - Please **honor the rights and privacy of everyone** whom you think may be involved to protect both our students and our staff members

Meeting Objectives

- Provide parents and families with an overview of
 - The timeline of events and a summary of alleged misconduct
 - Our response to the series of incidents and missteps which created an adverse climate and culture
- Partner with parents to end retaliatory behaviors that jeopardize students' emotional and physical safety
- Move forward as a safe and supportive community

Timeline of Events

January 2, 2020

- Office of Student Protections and Title IX (OSP) receives a report of misconduct involving the team on a recent unauthorized boys' basketball overnight trip, and begins its first investigation.

January 7, 2020

- While conducting the investigation, OSP finds additional serious policy violations and failures to follow proper protocols by adults to ensure student safety
- Adults are removed from their positions.

January 9, 2020

- Community notification sent to basketball team and school community.

Timeline of Events

January 13, 2020

- OSP finds greater systemic policy violations by adults.

January 14, 2020

- OSP receives a new, separate complaint of alleged sexual misconduct and initiates a new second investigation.

January 16, 2020

- OSP learns that school leadership was aware of student-on-student retaliation that was not properly reported. OSP begins a third investigation.

Timeline of Events

January 17, 2020

- Office of Inspector General (OIG) receives a new, separate report of alleged sexual misconduct related to the girls' basketball team, and begins a fourth investigation.

January 24-25, 2020

- OIG requests removal of an adult based on information obtained by OIG during the investigation of the incident related to the girls' basketball team.
- Community notification is sent to the girls' basketball team and the school community.

Timeline of Events

January 29-31, 2020

- District was made aware of additional systemic school-wide issues regarding misconduct and sports violations.
- Additional adults are removed.
- Due to the severity of the allegations and the adverse culture that was created, the remainder of the boys' basketball season is suspended.
- A community notification letter is issued.

Key Allegations

There are four investigations at the OIG and OSP.

- Alleged *sexual* misconduct
- *Retaliation* and *interference* with investigations
- Serious misconduct that led to student harm

Allegations are serious and involve student misconduct
and adult misconduct

Summary of Allegations

There are four investigations at the OIG and OSP. Allegations involve student and adult misconduct including:

Sexual Misconduct and Related Procedures

- Sexual misconduct
- Failure to follow mandatory sexual misconduct reporting procedures, safety procedures, and related policies.

Retaliation

- Repeated and ongoing retaliation against witnesses and complainants
- Improper student discipline

Interference with Investigations

- Interference with an official investigation by school leadership and staff
- Withholding evidence from investigative bodies

Misconduct that harm students

- Improper evidence gathering and retraumatizing interviews of students
- Failure to provide appropriate support services to students
- Failure to create safety plans for students
- Dishonesty to families
- Violations of Board's transportation policy
- Allowing suspended employees to continue to work

Athletics

- Athletic recruiting violations
- Financial misconduct with respect to athletics' program accounts
- Violation of Board's volunteer policy and vetting protocols for volunteers

Summary of Investigations

- District leaders were provided information and evidence from investigators demonstrating egregious and systemic policy violations, misconduct, and failure to protect students at LPHS.
- Multiple investigations are ongoing, and the removed employees will not be at school while the investigations are in process.
 - Some aspects of these investigations may be concluded before others.
 - Updates will be provided as warranted and as different aspects of the investigations are concluded.
- While we know this is difficult for the LPHS community, we must ensure LPHS is a safe, supportive, and healthy environment for your children.

Upcoming Audits

These investigations indicate a systemic failure to keep students safe at LPHS. The following upcoming audits will help identify and evaluate areas for essential improvements:

- Internal Audit will conduct an assessment of the school's compliance with these board policies:
 - Reporting of Child Abuse, Neglect and Inappropriate Relations between Adults and Students
 - Comprehensive Non-Discrimination, Harassment, and Retaliation Policy
 - Sexual Health Education
 - Volunteer Policy
 - Student Travel Policy
 - Athletics Constitution and Bylaws
 - Staff Acceptable Use Policy
- In addition, CPS Safety & Security has commissioned a comprehensive school safety audit:
 - Physical safety conditions
 - Safety and security protocols
 - Access Control and Visitor management protocols
 - Emergency plans protocols

Supports Provided to Those Affected

- Instituted Interim Measures - Issued No Contact directive for individuals involved and created safety plans for impacted students.
- Met with impacted students and parents to provide support and resources to address specific needs.
 - OSP will continue to coordinate on-going school-based clinical support.
 - OSP will continue to support affected students as needed.
 - On-site support for school community including meeting with the boys basketball team and availability for students throughout the day to drop-in and receive support as needed.
- Remain available to entire school community.
- OSP will provide targeted training to the school to ensure understanding of protocols and student safety.

LPHS Leadership Transition

- LSC will continue to search for a new contract principal.
- Network Chief has assigned Jerryelyn Jones and Judith Gibbs as Administrators in Charge who will:
 - Manage LPHS' day-to-day operations with guidance from Chief LeMone
 - Ensure continuity of programs and supports for students, staff, and parents
 - Perform principal duties until LSC selects the next contract principal
- AP Brown and AP Duncan will continue in current roles.

Parent Questions

Question Norms

- Questions should be respectful.
- Due to the ongoing investigation, we are not able to answer questions about any individual who may be involved.
- Please respect the privacy of the parties involved.

Office of Student Protections and Title IX

Office of Student Protections and Title IX
Chicago Public Schools
110 N. Paulina St.
Chicago, IL 60612

OSP Main Line: 773-535-4400

E-Mail: osp@cps.edu

Website: www.cps.edu/osp

EXHIBIT 2

1/24/2021

Lincoln Park High School: Multiple allegations of sex misconduct, wrongdoing led to removal of top officials, basketball season's suspens...

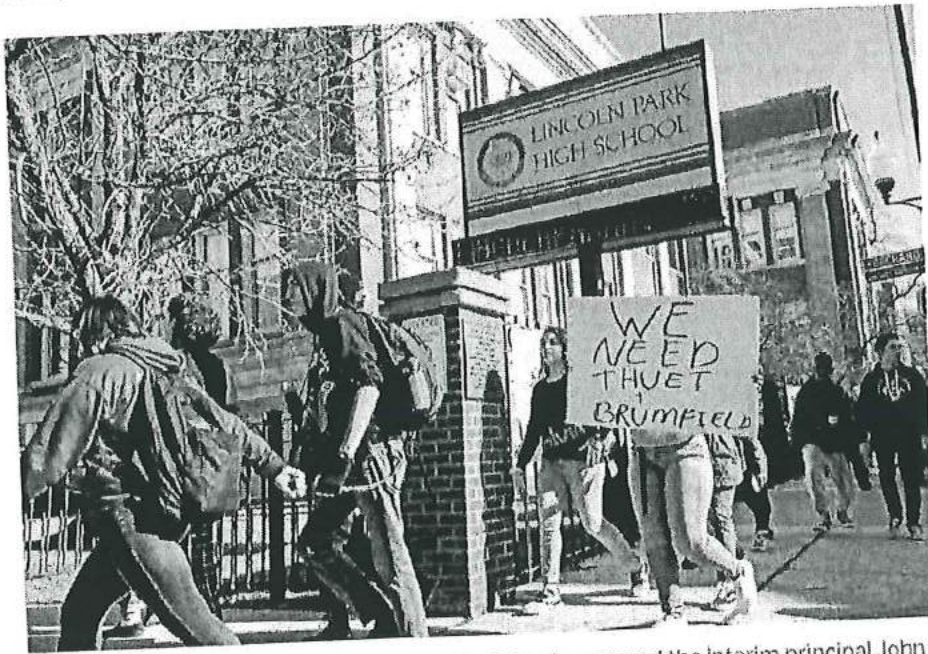
CS★T

EDUCATION NEWS SPORTS

Multiple allegations of sex misconduct, other wrongdoing led to removals at Lincoln Park H.S., basketball season suspension, CPS says

Students staged a walkout to protest the actions by CPS, which officials detailed Monday night.

By Nader Issa, Stefano Esposito, and Michael O'Brien | Updated Feb 3, 2020, 9:11pm CST



Students stage a protest walkout Feb. 3, 2020, after Chicago Public Schools removed the interim principal John Thuet and assistant principal Michelle Brumfield. | Ashlee Rezin Garcia/Sun-Times

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The allegations that led to the ouster of top administrators at Lincoln Park High School and the suspension of the remainder of the boys basketball season last week included multiple instances of sexual misconduct, retaliation against witnesses, lying to families and

1/24/2021

Lincoln Park High School: Multiple allegations of sex misconduct, wrongdoing led to removal of top officials, basketball season's suspens...

financial mismanagement of the athletics program, Chicago Public Schools officials said at a meeting at the school Monday night.

CPS Chief Schools Officer Bogdana Chkoumbova told a packed school auditorium that students had been harmed "physically" and "emotionally."

The decision to remove the school leadership is "irreversible," said Chkoumbova.

"There are allegations of both adult-on-student sexual misconduct as well as student on student," Deb Spraggins, director of investigations for the Office of Student Protections, said.

But Marybeth Jones, a member of the local school council, said members of the school's governing body were "shocked" and blindsided" by the removals.

"It would be unconscionable for CPS to decapitate the most student focused, faculty focused, safety focused and community dedicated administration it has had in anyone's memory," she said.

In a presentation shown at the meeting, CPS laid out in broad terms the allegations that have prompted four distinct investigations by the CPS Office of Student Protections and Title IX (OSP) and the CPS Office of Inspector General.

The presentation did not provide extensive details of the incidents or allege who was specifically involved. Chkoumbova said additional details would not be immediately forthcoming as the investigations continued.

The allegations also include:

- Failure to follow mandatory sexual misconduct reporting procedures
- Repeated and ongoing retaliation against witnesses and complainants
- Improper student discipline
- Interference with an official investigation by school leadership and staff
- Withholding evidence from investigative bodies
- Improper evidence gathering and retraumatizing interviews of students
- Dishonesty to families

1/24/2021

Lincoln Park High School: Multiple allegations of sex misconduct, wrongdoing led to removal of top officials, basketball season's suspens...

- Allowing suspended employees to continue to work
- Athletic recruiting violations
- Financial misconduct with respect to athletics' program accounts

Probes began in early January

The series of events started Jan. 2 when the OSP received a report of misconduct involving the Lincoln Park boys' basketball team on a trip to Detroit near the end of December. Five days later, the district found allegations of "additional serious policy violations," according to the presentation. That's when Lions basketball coach Pat Gordon was suspended by CPS.

The district at that time was investigating claims about students having sex in Detroit, social media being involved and that Gordon knew about it, the Sun-Times previously reported. Gordon, who denied knowledge of the alleged incident in Detroit, has not been accused of improper contact with a student.

As the investigation continued, CPS days later found "greater systemic policy violations by adults," though the presentation doesn't clarify what those included.

Alleged assault in the school

Investigators on Jan. 14 learned of a new, separate complaint of alleged sexual misconduct, the presentation says. A CPS source said that involved a female and male student inside a classroom and was unrelated to the basketball team.

Two days later CPS found a case of "student-on-student retaliation previously reported to school leadership that was not properly reported to ensure student safety," the presentation says. Those findings prompted the opening of two new investigations.

On Jan. 17, the Inspector General's office received another report of alleged sexual misconduct involving the girls' basketball team and launched a fourth investigation. The IG's office on Jan. 24 requested the removal of an unidentified adult related to the girls' basketball team investigation.

Later that week, the district "was made aware of additional systemic school-wide issues regarding misconduct and sports," according to the presentation. That's when CPS decided to remove Interim Principal John Thuet and Assistant Principal Michelle Brumfield while reassigning a dean and interim basketball coach Donovan Robinson.

1/24/2021 Lincoln Park High School: Multiple allegations of sex misconduct, wrongdoing led to removal of top officials, basketball season's suspens...

The remainder of the boys basketball season was suspended "due to the severity of the allegations and the adverse culture that was created," the presentation states.

Team culture defended

Gordon on Monday denied the team culture was a problem and said the complaints are from disgruntled people.

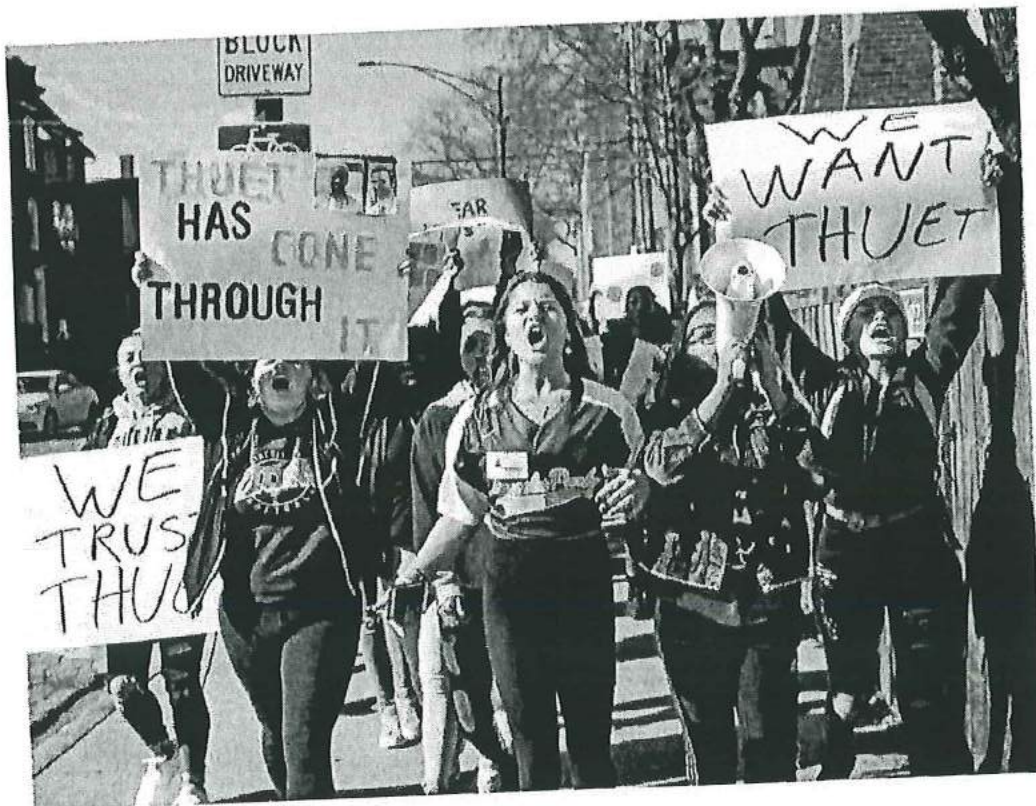
"Our culture is better than any other program in the city," he said.

"Does this mean anyone can say anything and [CPS] is going to suspend the coach? ... Some of the stuff I'm hearing is about bullying and favoritism. Every coach has favoritism. We favor the kids that work hard and are committed to the program."

Robinson said the response by CPS has been too severe, especially because the team had been slated to appear in the Public League playoffs on Tuesday.

"The players should be able to play in the city playoffs and not be punished for something they continue to say isn't true," he said. "This shows us that the district hasn't moved fully with restorative justice. They reacted with harsh discipline without factual evidence."

Neither Thuet nor Brumfield could be reached for comment.



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Ashlee Rozin Garcia/Sun-Times

LSC surprised

Parents teachers and students expressed frustration during the public meeting Monday night at the school's auditorium that at times became raucous.

Jones, who is also a parent, said, "LSC members are appalled of the characterization of these three individuals taking place in the local media as a result of this action and CPS' opaque explanation of the move," she said, referring to the removal of the principal, assistant principal and dean.

Chkoumbova, responding to the concerns raised at the meeting, said: "I really hear how passionately many of you spoke of your experience working with the administration here at this school, I also want to let you know that these ... are not decisions that are taken lightly. If there is no evidence or the investigations are not concluding that this is the next right move, CPS would not have done this."

Added CPS Security Chief Jadine Chou: "Believe me, I wish we could give you more info but unfortunately we can't."

Student walkout

Before some of the allegations were outlined later Monday, about 300 Lincoln Park High School students walked out of class in the morning, demanding the reinstatement of Theutt and Brumfield — as well as the resumption of the basketball season.

"This is all we know," said Romelle Howard, co-captain of the basketball team. "We worked too hard to come this far just for our season to end. It's pretty messed up."

Several members of the basketball team said Monday that some of the claimed misconduct was nothing more than a made-up rumor.

Ismail Habib, who is also a basketball team co-captain, said he's worried about the impact of the suspended season on some of his teammates.

"CPS says they care, they care about our health. But this is injuring us," Habib said. "We might stop going to school because of this, because basketball is the thing that makes us go."

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CPS suspends Lincoln Park's boys basketball season, removes principal

Lincoln Park high school basketball coach Pat Gordon suspended by CPS

Several students taking part in the walkout said the issue was much broader than the fate of the basketball season. Those students demanded the return to school of Thuet and Brumfield.

"We've always had a reputation of our school being, like, druggie — all these bad connotations about our school — but they made it so much better in the last semester that they've been here," said Grace Kibbey, 16, a cheerleader.

'No one knows what happened'

The walkout lasted about an hour and involved students circling the school, chanting and holding aloft signs in support of the team and the missing school administrators.

Christy Bauhs, a parent with two kids at Lincoln Park, said she gets "choked up" thinking Thuet and Brumfield are no longer at the school.

"In the short time they've been here, they've completely changed the atmosphere of the school. Thuet is amazing," Bauhs said.

She said she's upset at the lack of transparency from CPS.

"No one knows what happened — that's why everyone is freaking out," Bauhs said. "The [lack of] communication is making it worse. If they would just tell us exactly what happened, then maybe we'd be like, 'Oh, OK.'"

GRID VIEW



EXHIBIT 3



Office of Employee Engagement
42 West Madison Street, 9th Floor - Chicago, Illinois 60602

July 20, 2020

Patrice Gordon
[REDACTED] Avenue
Chicago, IL 60618

Dear Mr. Gordon:

Based on the results of the discharge hearing held on July 10, 2020, I have determined that sufficient basis exists to terminate your services as a School Security Officer in the Chicago Public Schools. Therefore, you are hereby notified that you are suspended without pay, effective July 21, 2020.

If the Board of Education of the City of Chicago adopts my recommendation, your employment will be terminated and a Do Not Hire designation will be placed in your record.

If you have any questions, please contact the Office of Employee Engagement at EmployeeEngagement@cps.edu.

Sincerely,

A handwritten signature in cursive script that reads "Mary Ernesti".

Mary Ernesti
Executive Director
Employee Engagement

ME:lg

cc: Libby Massey
Employee Services
ShaVonne West
Crystal Carrington
Eric Steinmiller
Griffin Ross

I have received the original suspension letter, this ____ day of _____ 2020.

Patrice Gordon

EXHIBIT 4

DocuSign Envelope ID: 271D02DF-9A6E-4207-B3BF-2A1A830A2F3C



42 West Madison Street, 3rd Floor • Chicago, IL 60602

Janice K. Jackson, Ed.D
Chief Executive Officer

July 24, 2020

Patrice Gordon
3721 West Montrose Avenue
Chicago, IL 60618

Dear Mr. Gordon:

On July 22, 2020 the Board of Education of the City of Chicago approved my recommendation, pursuant to Board Rule 4-1, to terminate your services as a School Security Officer the Chicago Public Schools. Your dismissal is effective immediately on the date of this letter.

Please be advised that, as a result of your termination, you are no longer eligible for hire in the Chicago Public Schools and a do not hire ("DNH") has been placed on your file. In addition, pursuant to the Board's Volunteer Policy, you may not volunteer, either directly with CPS or through an organization, at any CPS school or CPS-affiliated event. You also may not work in a role that involves contact with CPS students. You may petition the Chief Executive Officer to remove that designation. The request should be addressed to The Office of Employee Engagement, 42 West Madison Street, 9th Floor, Chicago, Illinois 60602. Please note that while a petition may be made at any time after placement of the designation, only one petition every two years shall be considered. The procedures for removal of the DNH designation may be found here: cps.edu/oe.

If you have any questions, please contact the Office of Employee Engagement at (773) 553-2696 or EmployeeEngagement@cps.edu.

Sincerely,

DocuSigned by:

Pedro Soto

7970DEEF92FD49F...
Janice K. Jackson, Ed.D
Chief Executive Officer

JJ:ME:lg

cc: Libby Massey
Employee Services
ShaVonne West
Crystal Carrington
Eric Steinmiller
Griffin Ross

I have received a copy of the foregoing Request for Dismissal on this ____ day of ____ 2020.

Patrice Gordon

EXHIBIT 5

Lincoln Park Boys Basketball Itinerary for Motor City Roundball Classic (MCRC) in Detroit

Fri 12/27 vs Ferndale 8:20pm	Sat 12/28 vs Grand Blanc 6:30	Sun 12/29 vs Pershing 3:20p
9am Meet at LP	9am Wakeup Breakfast	9am Wakeup Breakfast
10am Depart For Detroit	10am Meet	10am Meet
3-3:30 Arrive in Detroit Check-IN	11- 12pm Downtime	10:30-11:30 Downtime/ Pack Bags , Clean Rooms
4:30 Meet in Lobby in Track Suits and Game Uniforms	12:30 Meet in the Lobby in Track Suits and Game Uniforms	11:30 Meet in Lobby in in Track Suits/ CHECKOUT
5- 6 Practice @ Lawrence Tech	1-2 Tour Detroit Pistons (Just The Team)	12-1 Practice @ Lawrence Tech
6:15- 7 Lunch	3-4 Practice TBA	1:15- 2 Lunch
7:15 @ the gym	4:30- 5:15 Lunch	2:15 @ the Gym
7:30 Pre Game	5:30 @ the gym	2:30 Pre Game
8:20ET Beat Ferndale	5:45 Pre Game	3:20ET Beat Pershing
10:15 Return to Hotel	6:30ET Beat Grand Blanc	5:30 On The Road Home
11:30 Room Check/Lights out	8:30 Return To Hotel	9pm Arrive at LP
	9pm Dinner Fish Fry	
	11:30 Room Check Lights out	

EXHIBIT 6



Office of Employee Engagement
42 West Madison Street, 9th Floor - Chicago, Illinois 60602
January 8, 2020

Patrice Gordon
[REDACTED]

Chicago, IL 60602

Dear Ms. Gordon:

You are hereby notified that, effective immediately, you are removed from duty, with pay, as a School Security Officer in the Chicago Public Schools pending the outcome of a Pre-Suspension Hearing which will be convened in the Office of Employee Engagement, 42 West Madison, on January 13, 2020 at 9am. This hearing is based on an allegation that, while working as a School Security Officer at Lincoln Park High School, you engaged in misconduct related to an overnight basketball trip to Detroit that took place over Winter Break. The hearing could result in your suspension without pay.

Upon receipt of this letter, you are required to relinquish any and all property belonging to the Board of Education, including keys to the school building. Further, with the exception of attending the Pre-Suspension Hearing and unless approved as outlined below, you are prohibited from being on Board property and will be considered trespassing if present on Board grounds.

If you are the parent of a CPS student and you want to attend a parent/teacher conference or other activity related to your child's education, you must contact the principal in advance, show the principal a copy of this letter, and obtain the principal's permission.

If you have any questions, you may contact the Office of Employee Engagement at (773) 553-2696.

Sincerely,

A handwritten signature in cursive script that reads "Mary Ernesti".

Mary Ernesti
Executive Director of Employee Engagement

ME:kc

cc: Camie Pratt
Takisha Dunlap-Freeman
Libby Massey
Kelly Tarrant
Employee Services
ShaVonne West
Hilda Flores
Sharon Caldwell
Jadine Chou
Ronan Shableski
Crystal Carrington
Elizabeth A Brown
Michelle Brumfield
Kenneth Duncan
John Thuet
Griffin Ross

EXHIBIT 7



Laura LeMone, EdD

Network 14

lalemone@cps.edu

773-535-8190

West Loop Office - 110 North Paulina St. Chicago, Illinois 60612

January 31, 2020

Dear Lincoln Park Parents and Families,

In Chicago Public Schools, we expect our school leaders and staff to prioritize the safety and security of all students and we have zero tolerance for any behavior that compromises the wellbeing of our students.

Today, I am writing to inform you that due to multiple allegations of serious misconduct involving the athletics program at Lincoln Park High School, the district has removed Interim Principal John Thuet and Assistant Principal Michelle Brumfield from their positions. Dean John Johnson and Boys Basketball Coach Donovan Robinson have been reassigned from their duties pending the outcome of these investigations. Unfortunately, due to the severity of the misconduct allegations involving the team, the remainder of the varsity boy's basketball season has been suspended until further notice. I know this is difficult news for the school community, but please know that we would not have taken these actions if we did not believe they were necessary to promote the safe and supportive educational environment your children deserve.

We are committed to supporting your children during this challenging time, and we have appointed Judith Gibbs and Jerryelyn Jones as the Administrators-in-Charge of LPHS. Ms. Gibbs and Ms. Jones are both veteran school leaders with years of successful school leadership experience in several Chicago Public Schools (CPS). We are confident that Ms. Gibbs and Ms. Jones will ensure that LPHS has a successful remainder of the 2019-20 school year and that the teachers and students are supported.

I would like to invite you to a meeting with parents and families on Monday, February 3 at 6 p.m. to discuss the school leadership change and transition plans. The meeting will be held in the school's auditorium.

LPHS will continue to be a strong school community with your support, and your child's best interests will continue to be the central focus of decisions made at the school level.

While I am unable to discuss details regarding the investigations that led to the removal of these staff members, I am available to discuss steps the district takes to keep students safe and matters related to your child. I can be reached at lalemone@cps.edu or (773) 535-8232. If you have any concerns related to student protections, you can contact the Office of Student Protections and Title IX at (773) 535-440.

Thank you

A handwritten signature in dark ink, appearing to read "Laura LeMone".

Laura LeMone
Chief of Network 14
Chicago Public Schools

EXHIBIT 8

1/19/2021

Lincoln Park High School basketball team suspended from season - Chicago Tribune

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Leaders removed, boys basketball season suspended amid allegations of 'serious misconduct' at Lincoln Park High School

By HANNAH LEONE
CHICAGO TRIBUNE | FEB 03, 2020

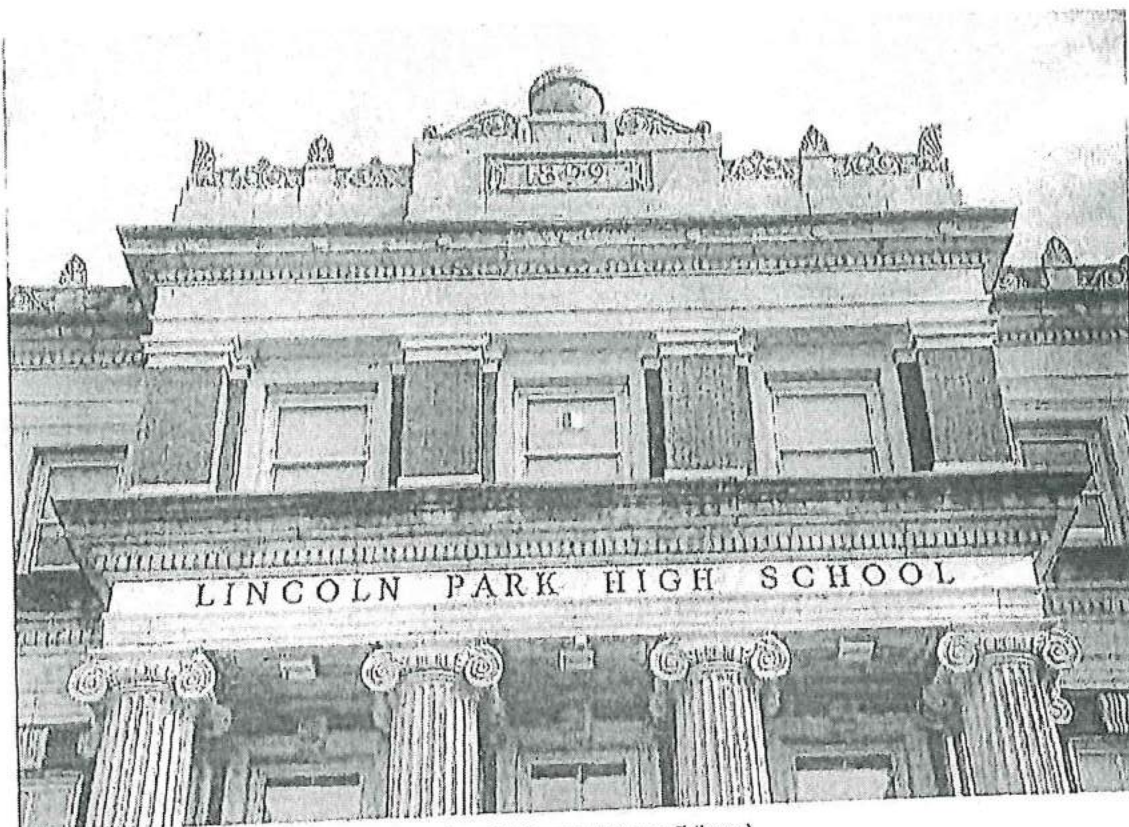


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1/19/2021

Lincoln Park High School basketball team suspended from season - Chicago Tribune



Lincoln Park High School in Chicago in 2016. (Jose M. Osorio/Chicago Tribune)

Lincoln Park High School's varsity boys basketball team is suspended from the season, and school leaders have been removed amid allegations of "serious misconduct," according to a letter sent to families Friday.

"Due to multiple allegations of serious misconduct involving the athletics program at Lincoln Park High School, the district has removed Interim Principal John Thuet and Assistant Principal Michelle Brumfield from their positions," states the letter from Chicago Public Schools Network Chief Laura LeMone. "Dean John Johnson and Boys Basketball Coach Donovan Robinson have been reassigned their duties pending the outcome of these investigations. Unfortunately, due to the severity of the misconduct allegations involving the team, the remainder of the varsity boy's basketball season has been suspended until further notice."

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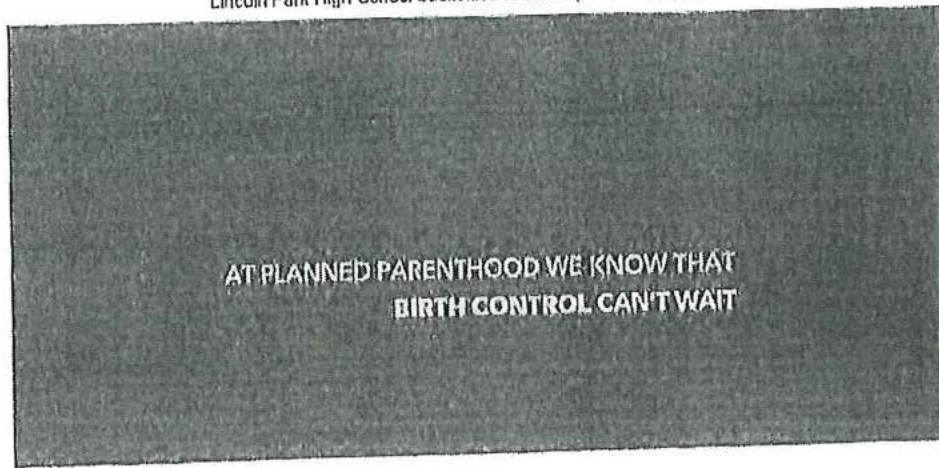
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* (1) *Ph. c. schwanckii* Wood

1/19/2021

Lincoln Park High School basketball team suspended from season - Chicago Tribune



The letter does not mention head coach Pat Gordon, who was removed earlier in January, CPS officials confirmed.

The boys basketball team's families were informed an unidentified staff member had been removed from the school in a Jan. 9 letter, in which Thuet wrote he'd been "made aware" that members of the team "took an overnight trip over winter break that was not a school sponsored event."

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LECTIONS

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CORONAVIRUS IN ILLINOIS UPDATES

The unidentified staff member in the Jan. 9 letter was Gordon, a source told the Tribune.

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1/19/2021

Lincoln Park High School basketball team suspended from season - Chicago Tribune

An online petition to reverse the team's suspension, created by one of the junior players, was approaching 1,500 signatures Sunday afternoon.

"I'm here to ask you guys that support me and my teammates in this basketball world to help us get through this," the petition implores. "This is the city playoffs coming up next week Tuesday and our seniors and everybody else that plays on the team is hurting... They already have taken away our coach now they want to take away our season this is not right we have worked so hard to get to the point that we are at today we refuse to let this happen to us."

Parents interviewed by the Tribune expressed frustration with the decision to suspend the team and with the limited information that had been provided to them. Players said they found out by email that their season was suspended and worried they might miss out on the Chicago Public League playoffs starting this week.

Mariama Habib, the mother of the player who created the petition, said the team should be able to keep playing while the investigation is ongoing.

"This is all crazy," said another parent whose son is a senior on the team. "These kids are great at what they do, and I feel like they should have the opportunity to finish off their season."

While Friday's news is difficult for the school community, district staff wouldn't have taken such actions if they didn't believe they were necessary to promote a safe and supportive environment, LeMone wrote.

For the time being, CPS has appointed Judith Gibbs and Jerryelyn Jones as the "Administrators-in-Charge" of LPHS. Both are described as "veteran school leaders with years of successful school leadership experience in several Chicago Public

1/19/2021

Lincoln Park High School basketball team suspended from season - Chicago Tribune

Families are invited to a meeting at 6 p.m. Monday in the school's auditorium about the leadership change and transition plans.

"LPHS will continue to be a strong school community with your support, and your child's best interests will continue to be the central focus of decisions made at the school level," the letter states. "While I am unable to discuss details regarding the investigations that led to the removal of these staff members, I am available to discuss steps the district takes to keep students safe and matters related to your child."



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Also, on Jan. 25, Thuet sent all LPHS families an email about "an allegation that one of our employees engaged inappropriately with a student." The employee, who was not identified in the email, was removed from the school, and an investigation was initiated by the Office of Inspector General, according to the email.

According to the source, the employee was Larry Washington, the girls basketball coach.

The boys varsity team was ranked 13th in Illinois as of Friday, with a 19-3 record overall and 8-1 in its 10-team conference. They narrowly won their last game 59-58 and were scheduled for a playoff game Tuesday. State finals are in March.

Chicago police are not investigating, according to Sgt. Rocco Alioto, a police spokesman who was citing preliminary information.

EXHIBIT 8

1/25/2021

Lincoln Park High School scandal has sparked 5 investigations and top leaders' removal. Here is how it unfolded. - Chicago Tribune

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BREAKING NEWS NEWS

Lincoln Park High School scandal has sparked 5 investigations and top leaders' removal. Here is how it unfolded.

By HANNAH LEONE
CHICAGO TRIBUNE | FEB 07, 2020



1/25/2021

Lincoln Park High School scandal has sparked 5 investigations and top leaders' removal. Here is how it unfolded. - Chicago Tribune



People applaud other speakers Monday, Feb. 3, 2020 during a CPS meeting after leadership changes were announced at Lincoln Park High School. (Brian Cassella / Chicago Tribune)

Lincoln Park High School scandal has sparked 5 investigations and top leaders' removal. Here is how it unfolded.

How the scandal unfolded

Dec. 27-29

Members of the Lincoln Park High School boys basketball team take an overnight trip to the Detroit area that district officials would later call "unauthorized." Lincoln Park played in the Motor City Roundball Tournament, according to the tournament's website.

Jan. 2

CPS' Office of Student Protections and Title IX receives a report of misconduct

<https://www.chicagotribune.com/news/breaking/ct-cb-lincoln-park-high-school-scandal-timeline-20200206-emooyduj7ffw5biq6gbfikfd44-htmlstory.html>

1/25/2021

Lincoln Park High School scandal has sparked 5 investigations and top leaders' removal. Here is how it unfolded. - Chicago Tribune

"involving the team" on the trip and begins what becomes the first of at least four pending investigations involving Lincoln Park High.



(Brian Cassella/Chicago Tribune)

Jan. 7

During that investigation, CPS officials say they uncover "additional serious policy violations and failures to follow proper protocols by adults to ensure student safety" and remove multiple adults from their positions. A CPS official later clarifies the adults referenced included boys basketball coach Pat Gordon and two adults who helped out with the team "but were not staff members and did not complete the district's volunteer application process as required," and were prevented from participating in school activities.

Jan. 9

A letter from interim Principal John Thuet alerts boys basketball team families that the staff member who led the trip during winter break "has been removed

1/25/2021

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 from the school. A CPS source later confirms that staff member is near varsity coach Pat Gordon.



LINCOLN PARK HIGH SCHOOL
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 Chicago, IL 60614
 P: 773-534-8130
 F: 773-534-8218

John Thuet
 Interim Principal

Elizabeth Brown
 Assistant Principal

Kenneth Duncan
 Assistant Principal

Michelle Brumfield
 Assistant Principal

Dear Lincoln Park High School Boys Basketball Team Parents and Families,

The safety of your children is always our top priority, which is why I must inform you of a situation that has recently come to light. I've been made aware that members of the boys basketball team took an overnight trip over winter break that was not a school sponsored event. The staff member who led the trip has been removed from the school, and the district is investigating this situation in accordance with CPS policy.

Please know that we are taking this situation seriously, and we remain committed to providing your children with a safe, positive learning environment where they can reach their full potential. While I am unable to discuss details regarding the investigation, I am always available to discuss steps the district takes to keep students safe and matters related to your child. I can be reached at (773) 534-8130 or jthuet@cps.edu.

Sincerely,
 Principal Thuet

A letter from interim Principal John Thuet.

Jan. 13

OSP finds "greater systemic policy violations by adults," according to CPS.

Jan. 14

OSP receives a "new, separate complaint of alleged sexual misconduct" and initiates a second investigation related to Lincoln Park High. Sources with firsthand knowledge tell the Tribune the misconduct involved two students. Chicago police later confirm they are investigating a report by a 15-year-old girl that she was sexually assaulted by a male at the school on Jan. 13.

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Jan. 16

OSP "learns that school leadership was aware of student-on-student retaliation that was not properly reported," according to CPS. OSP opens a third investigation related to Lincoln Park High.

Jan. 17

CPS' Office of Inspector General receives a "new, separate report of alleged sexual misconduct related to the girls basketball team," according to CPS, and a fourth investigation related to Lincoln Park High School is launched.

Jan. 25

The Office of Inspector General requests the removal of another adult based on information obtained while investigating "the incident related to the girls' basketball team."

Interim Principal Thuet informs parents via email of "an allegation that one of our employees engaged inappropriately with a student" and that the employee "has been removed from the school." A CPS official later confirms the subject of the investigation is girls coach Larry Washington.

Jan. 29-31

CPS is "made aware of additional systemic schoolwide issues regarding misconduct and sports violations." In a Jan. 31 letter to school families, a district official announces that "due to multiple allegations of serious misconduct involving the athletic program," the district has removed Thuet and Assistant Principal Michelle Brumfield, reassigned Dean John Johnson and basketball coach Donovan Robinson, and suspended the boys varsity basketball season until further notice. It later comes to light that Brumfield and Thuet were fired and designated "do-not-hire" by CPS.

Brumfield is at school Jan. 31 when she is called to CPS headquarters and told she is fired, she later tells the Tribune: "I asked questions, I didn't get any

1/25/2021

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answers, and I really left confused in a daze." Robinson, who is also a community relations specialist at Michele Clark High School, is on vacation in Mexico and learns from a media report that he is reassigned. He checks his email and sees he is removed from duty, with pay, as a community relations representative, pending the outcome of a pre-suspension hearing "based on an allegation that, while coaching at Lincoln Park High School, you engaged in inappropriate communication with students."



Laura LeMone, EdD
Network 14
llemon@cps.edu
773-535-8190

West Loop Office - 110 North Paulina St. Chicago, Illinois 60612

January 31, 2020

Dear Lincoln Park Parents and Families,

In Chicago Public Schools, we expect our school leaders and staff to prioritize the safety and security of all students and we have zero tolerance for any behavior that compromises the wellbeing of our students.

Today, I am writing to inform you that due to multiple allegations of serious misconduct involving the athletics program at Lincoln Park High School, the district has removed Interim Principal John Thuet and Assistant Principal Michelle Brumfield from their positions. Dean John Johnson and Boys Basketball Coach Donovan Robinson have been reassigned from their duties pending the outcome of these investigations. Unfortunately, due to the severity of the misconduct allegations involving the team, the remainder of the varsity boys' basketball season has been suspended until further notice. I know this is difficult news for the school community, but please know that we would not have taken these actions if we did not believe they were necessary to promote the safe and supportive educational environment your children deserve.

A letter from CPS.

Feb. 3

Hundreds of Lincoln Park students walk off campus to rally in support of the school leaders who were removed and to push for the basketball team to be allowed to play. They also call for the release of more information about the investigations.



1/25/2021

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Lincoln Park High School student and captain of the boys basketball team, Romelle Howard, 18, talks to reporters as students walk out of classes on Feb. 3. (Jose M. Osorio/Chicago Tribune)

That evening, the school hosts a crowded community meeting providing new details of the four investigations, marked by emotional comments from audience members critical of CPS' handling of the matter.

Lincoln Park High School Parent Meeting

February 3, 2020

Click above to see the slideshow from the meeting.

Feb. 4

Some players from the suspended team show up at two CPS offices seeking a last-minute reprieve to play in the evening city tournament game against Perspectives IIT. The effort is unsuccessful, and the game is forfeited. The Illinois High School Association confirms CPS has also withdrawn the team from the upcoming state basketball tournament. Donovan Robinson, the

1/25/2021

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 from the upcoming state basketball tournament, DONOVAN ROBINSON, the reserve coach who took over when Pat Gordon was removed, has a hearing with CPS in which he learns he will be suspended without pay.

Feb. 5

A letter informs Lincoln Park families that Judith Gibbs, one of two administrators-in-charge brought in days earlier to lead the school amid the leadership shakeup, is already out. Gibbs "has decided to leave LPHS today after determining that she was not a good fit for LPHS," according to a letter to families.

A district spokesman confirms that Gibbs is the subject of "an allegation involving improper contact with a student." CPS does not elaborate on the claim, but a video appears to show an adult female momentarily holding a student's chin after he yanks his hand away from hers.

CPS also sets up a special hotline and email for the LPHS community.



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February 5, 2020

SECTIONS

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supportive school cultures in Chicago Public Schools (CPS). We believe he will be a great addition to the LPHS' school community.

Mr. Davis will serve in place of Ms. Judith Gibbs who has decided to leave LPHS today after determining that she was not a good fit for LPHS.

A letter from CPS.

Feb. 6

Tensions at LPHS are heightened by student walkouts, sit-ins and physical

1/25/2021

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 tensions at LPHS are heightened by student walkouts, sit-ins and physical fights; prompting the school to bring in additional student support and safety measures. A student tells the media that he is the teen in the video whose face was grabbed.

Feb. 7

Members of the Lincoln Park High School Local School Council hold a press conference outside the school, saying they were left out of the decision to remove top administrators and demanding more information from CPS.

What CPS investigators are looking into

CPS says its investigations center on both students and adults, and include allegations of:

- Sexual misconduct and failure to follow mandatory sexual misconduct reporting procedures, safety procedures and related policies.
- Repeated and ongoing retaliation against witnesses and complainants
- Improper student discipline
- Interference with an official investigation by school leadership and staff
- Withholding evidence from investigative bodies
- Improper evidence gathering and retraumatizing interviews of students
- Failure to provide appropriate support services to students or create safety plans for students
- Dishonesty to families
- Violations of the Board of Education's transportation policy
- Allowing suspended employees to continue to work
- Athletic recruiting violations
- Financial misconduct related to athletic program accounts
- Violation of CPS volunteer policy and vetting protocols

Sources: Chicago Public Schools, Tribune reporting and news reports

Created by the Chicago Tribune dataviz team. On Twitter [@ChiTribGraphics](https://twitter.com/ChiTribGraphics)

EXHIBIT 9

1/29/2021

Lincoln Park High School scandal has sparked 5 investigations and top leaders' removal. Here is how it unfolded. - Chicago Tribune

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BREAKING NEWS NEWS

Lincoln Park High School scandal has sparked 5 investigations and top leaders' removal. Here is how it unfolded.

By HANNAH LEONE
CHICAGO TRIBUNE | FEB 07, 2020



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People applaud other speakers Monday, Feb. 3, 2020 during a CPS meeting after leadership changes were announced at Lincoln Park High School. (Brian Cassella / Chicago Tribune)

Lincoln Park High School scandal has sparked 5 investigations and top leaders' removal. Here is how it unfolded.

How the scandal unfolded

Dec. 27-29

Members of the Lincoln Park High School boys basketball team take an overnight trip to the Detroit area that district officials would later call "unauthorized." Lincoln Park played in the Motor City Roundball Tournament, according to the tournament's website.

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(Brian Cassella/Chicago Tribune)

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Dear Lincoln Park High School Boys Basketball Team Parents and Families,

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A letter from CPS.

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Lincoln Park High School student and captain of the boys basketball team, Romelle Howard, 18, talks to reporters as students walk out of classes on Feb. 3. (Jose M. Osorio/Chicago Tribune)

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February 3, 2020

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CPS also sets up a special hotline and email for the LPHS community.



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February 5, 2020

Dear Lincoln Park Parents and Families,

Today, I am writing to inform you that we have appointed Calvin Davis as a new Administrator-in-Charge (AIC) of LPHS alongside Jerryelyn Jones. Mr. Davis has been a veteran school leader with years of successful leadership experience building safe, positive, and supportive school cultures in Chicago Public Schools (CPS). We believe he will be a great addition to the LPHS' school community.

Mr. Davis will serve in place of Ms. Judith Gibbs who has decided to leave LPHS today after determining that she was not a good fit for LPHS.

A letter from CPS.

1/29/2021

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- Allowing suspended employees to continue to work
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Sources: Chicago Public Schools, Tribune reporting and news reports

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EXHIBIT 10

1/25/2021

Lincoln Park High School basketball season unlikely to resume, mayor says - Chicago Sun-Times

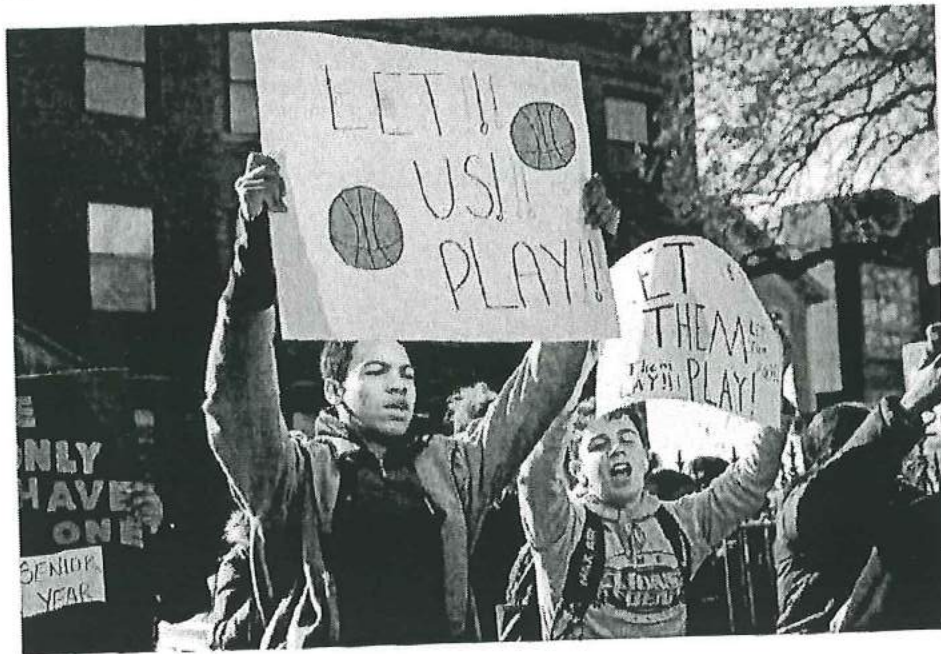


EDUCATION NEWS SPORTS

Lincoln Park High School basketball season unlikely to resume, mayor says

Lightfoot said CPS took the right steps in suspending the season, which led the Lions to forfeit a Public League playoff game Tuesday.

By Michael O'Brien, Lynn Sweet, and Nader Issa | Feb 4, 2020, 7:07pm CST



Ashlee Rezin Garcia/Sun-Times

Lincoln Park High School's boys basketball team is officially out of the Chicago Public League playoffs after forfeiting its first-round game Tuesday, and those hoping the team might get reinstated in time for the state playoffs are unlikely to get any relief from Mayor Lori Lightfoot.

The Lions forfeited their game against Perspectives-MSA days after the district suspended their season because of allegations that included misconduct during a team trip to Detroit near the end of December. CPS suspended the team's head coach, Pat Gordon, in early January. After further investigation uncovered several more serious

1/25/2021

Lincoln Park High School basketball season unlikely to resume, mayor says - Chicago Sun-Times

allegations, the district said it reassigned interim coach Donovan Robinson and fired interim principal John Thuet and assistant principal Michelle Brumfield.

Lightfoot, who was in Washington, D.C. Tuesday, told the Sun-Times she doesn't "have any reason to believe that they're going" to reinstate the team's season. "There's no coaches, so it's hard for the team to go forward," the mayor said.

RELATED

Multiple allegations of sex misconduct, other wrongdoing led to removals at Lincoln Park H.S., basketball season suspension, CPS says

Technically any Lincoln Park staff members with the proper coaching certifications could step in to coach the team if the suspension was lifted. But a CPS spokesman said Tuesday the decision to suspend the remainder of the season was based on serious allegations that went beyond concern about coaches.

"As we've said, there are allegations of student misconduct and adult misconduct," CPS spokesman Michael Passman said. "The season would not be suspended if the district was only looking at adult misconduct."

CPS has yet to get into specifics about the allegations that led to the suspensions and firings, only broadly describing the type of alleged misconduct. District officials are worried that going into deeper detail could subject any involved students to further trauma, a source said.

CPS officials said at a meeting with parents and students Monday night that there are multiple investigations into allegations of sexual misconduct, retaliation against witnesses, lying to families and financial mismanagement of the athletics program.

In addition to allegations against the boys team, the school is investigating the girls basketball team — the team's coach was removed from the school for alleged improper contact with a player on the girls team — and a separate allegation of sexual misconduct at the school involving two students not related to the teams.

Lightfoot said "the information that was provided by CPS personnel at the town hall last night was pretty fulsome."

1/25/2021

Lincoln Park High School basketball season unlikely to resume, mayor says - Chicago Sun-Times

"Based on the information I was provided, I have confidence that the CPS personnel took the right steps to make sure that we had a safe, healthy school environment for young people," Lightfoot said.

Playoff seeding coming up

The Illinois High School Association will seed the state playoffs on Feb. 18. If Lincoln Park's boys basketball team isn't included in the field it would be difficult for the team to be added after the fact, barring the type of legal injunction that allowed the Public League cross-country teams back into the state tournament in November after the Chicago Teachers Union strike.

Lincoln Park has already been removed from a shootout in Aurora it was scheduled to play in this weekend. The Lions' only remaining scheduled regular season game is Feb. 21 against Walldorf.

Perspectives-MSA coach Waybon McConnell is disappointed his team won't get a chance to face Lincoln Park on Tuesday. Lincoln Park is 19-3, finished second in the Red-North/West and is regarded as one of the best teams in the state.

"We really wanted to compete," McConnell said. "This was the first time Perspectives-MSA has ever made the Red Division city playoffs. My players, coaches, and I were excited to be able to go into my alma mater where I played basketball and coach against a mentor [Lincoln Park coach Pat Gordon]."

"I know a few kids and parents at Lincoln Park and they're heartbroken. It's not the way as a coach I ever want to win a game but it seems this is the outcome. I hope the entire Lincoln Park High School community can overcome this situation because it's truly a phenomenal institution academically and athletically."

Perspectives will face the Clark vs. Kenwood winner in the second round of the playoffs on Thursday.

EXHIBIT 11

1/24/2021

Vague misconduct allegations anger Chicago school parents

Vague misconduct allegations anger Chicago school parents

AP Associated Press

Updated
2/4/2020 1:32 PM

CHICAGO -- An investigation of a Chicago high school that led to the cancellation of the boys basketball season, and the removal of the principal and assistant principal revealed allegations of sexual misconduct by students and adults, retaliation against witnesses and athletic recruiting violations, officials said.

At a meeting Monday night in a packed Lincoln Park High School auditorium, Chicago Public Schools officials listed allegations of misconduct and dishonesty that seemed more akin to an athletic scandal at a major university than at a high school in a well-to-do neighborhood on Chicago's North Side.

The officials provided few details about incidents or the names of people they suspect were involved.

The meeting stemmed from an investigation that began early last month with a report of misconduct involving the basketball team during a trip to Detroit in December. The probe revealed what the CPS termed ' egregious and systemic policy violations' that led to the suspension of basketball coach Pat Gordon days later. Gordon has denied knowing anything about an alleged incident in Detroit and he has not been accused of improper contact with a student.

Last week, the school announced that the team's season had been canceled and the interim principal and an assistant principal had been

1/24/2021

Vague misconduct allegations anger Chicago school parents

removed. It said an allegation of sexual misconduct involving the girl's basketball team was also being investigated.

The most serious allegations centered on sexual misconduct.

'œThere are allegations of both adult-on-student sexual misconduct as well as student-on-student,' □ said Deb Spraggins, director of investigation for CPS' Office of Student Protections.

Officials say efforts appear to have been made to prevent investigators from learning what happened, starting with an allegation that mandatory sexual misconduct reporting procedures weren't followed, student-on-student retaliation against those who spoke to investigators, interference with an official investigation by school leadership and the withholding of evidence from investigators.

The presentation of the allegations was greeted with anger from community members, students and others who vehemently disagreed with canceling the season and removing the administrators and coaches. Just hours earlier, students walked out of class in protest,

Audience members chanted, 'œWhere is Due Process,' □ while heated exchanges and shouts prompted security staff to escort the CPS safety chief out of the meeting. The lack of any details provided by CPS only added to the audience's anger.

'œNo one knows what happened, that's why everyone is freaking out," said Christy Bauhs, a parent with two children attending the high school. 'œThe (lack of) communication is making it worse. If they would just tell us exactly what happened, then maybe we'd be like, 'Oh, OK.'"

EXHIBIT 12



Laura LeMone, EdD

Network 14

lalemone@cps.edu

773-535-8190

West Loop Office - 110 North Paulina St. Chicago, Illinois 60612

June 23, 2020

Dear Lincoln Park Parents and Families,

I hope this email finds you and your loved ones healthy and safe. I am writing today to update you on investigations involving coaches from the Lincoln Park athletics program who were removed from the school in January and February due to allegations of misconduct.

The Office of Student Protections and Title IX and the Office of Inspector General substantiated multiple allegations of serious misconduct at Lincoln Park High School. Based on these findings, the district has decided to file dismissal charges and move forward with a termination hearing for Pat Gordon (school security officer). In addition, the district has revised its discipline recommendation for Donovan Robinson (community relations representative at another CPS high school) and Larry Washington (day-to-day citywide substitute). While misconduct was substantiated, the district determined that it is appropriate for Mr. Robinson and Mr. Washington to return to their respective instructional positions. To ensure understanding of district policies moving forward, Mr. Robinson and Mr. Washington will receive training and support from the Network and the CPS Office of Student Protections and Title IX.

Nothing is more important to us than the safety and well-being of your children. We take all allegations extremely seriously, and these investigations were necessary to ensure that your child's safety will continue to be appropriately safeguarded. With these investigations behind us, I am confident that Lincoln Park will be a stronger and safer school community.

If you have questions, please feel free to contact me at lalemone@cps.edu.

Sincerely,

A handwritten signature in cursive script that reads "Laura LeMone".

Laura LeMone
Chief of Network 14
Chicago Public Schools